CITY OF El PASO DE ROBLES STORM WATER MANAGEMENT PLAN

Prepared by:

URS

130 Robin Hill Road, Suite 100
Santa Barbara, California 93117
(805) 964-6010 ◆ Fax: (805) 964-0259

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This document serves as the City of El Paso de Robles' (City) National Pollutant Discharge Elimination System (NPDES) Phase II Storm Water Management Plan (SWMP). This SWMP is designed to describe the City's program to comply with the proposed California NPDES General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) (Permit). This permit regulates Phase II MS4s in California. The City's SWMP is a guidance document to be used by the City's regulatory body, contractors, and the general public. It is also an evolving program that will be monitored and revised as necessary in order to address changes in the compliance programs or in the Permit requirements.

The City's SWMP defines strategies and guidelines for protection of water quality and reduction of pollutant discharges to the Maximum Extent Practicable (MEP) from all areas and facilities within the City. Section 2.0 of the SWMP provides an overview of the City, including current land use, city facilities, and the watershed. Section 3.0 addresses the regulatory framework of the City as a basis for incorporating the management practices and goals established by the SWMP. Section 4.0 through 9.0 discusses best management practices (BMPs), and associated measurable goals that will fulfill the requirements for the six program areas (referred to as Minimum Requirements) covered by the Phase II Guidelines. The six Minimum Requirements that must be included into the SWMP are:

- Public Education
- Public Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post Construction Storm Water Management
- Pollution Prevention/Good Housekeeping for Municipal Operations

The SWMP also defines how these BMPs will be monitored, and provides direction for annual reporting (summarized in Section 10.0). Specific existing City policies, plans and ordinances are defined as BMPs in the SWMP. These existing BMPs are the baseline of the City's SWMP, and future BMPs will be implemented over the next five years to comply with requirements in the Phase II General Permit.

1.1 REGULATORY BACKGROUND

In 1972, the Federal Water Pollution Control Act, which established the NPDES program, was adopted. The NPDES program regulates the discharge of wastes from point sources to surface waters. The Federal Water Pollution Control Act was amended in 1977 and became known as the Clean Water Act (CWA). In 1987 the CWA was again amended to add section 402, which established a framework for regulating discharges from municipal separate storm water systems (MS4s) as a special category of point source under the NPDES Program. In

1990, the United States Environmental Protection Agency (EPA) promulgated regulations for permitting MS4s serving a population of 100,000 people or more. These regulations, known as the Phase I regulations, require operators of medium and large MS4s to obtain storm water permits.

The EPA adopted the NPDES Phase II Storm Water regulations as a final rule in December 1999. The Phase II regulations address storm water discharges from MS4s with a population of less than 100,000 (Small MS4s). These regulations require operators of small MS4s, as designated by the EPA, State Water Resources Control Board (SWRCB), or the Regional Water Quality Control Boards (RWQCBs), to permit their discharges under NPDES. The SWRCB has prepared a draft Phase II General Permit for discharges from small MS4s (General Permit), and it is anticipated that most small municipalities will be covered under this permit. The draft Phase II General Permit requires the preparation and implementation of a SWMP.

1.2 STORM WATER MANAGEMENT PLAN OBJECTIVES

The overall goal of the City's SWMP is to establish a plan which defines how the City will implement the six Minimum Requirements to protect water quality. The SWMP must explain the BMPs that address the six minimum requirements, and each BMP must have accompanying measurable goals to be achieved during the permit term (March 10, 2003 through March 10, 2008). The purpose of the SWMP is to document and facilitate implementation of these compliance programs.

1.3 STORM WATER REGULATIONS APPLICABLE TO PASO ROBLES

An "MS4" is defined by the SWRCB as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

1. Designed or used for collecting or conveying storm water

2. Which is not a combined sewer

3. Which is not part of a Publicly Owned Treatment Works (POTW) as defined at Title 40 of the Code of Federal Regulations (CFR) Section 122.2

A "Small MS4" is defined as an MS4 that is not permitted under Phase I regulations. The General Permit that regulates discharges of storm water from Small MS4s is designated in one of the following ways: (1) Automatically designated by EPA because it is located within an urbanized area, or (2) Individually designated by the SWRCB or RWQCB after

considering factors such as high population density (1,000 residents per square mile), high growth or growth potential (growth greater than 25% between 1990 and 2000 or anticipated growth greater than 25% over a 10-year period), a significant contributor of pollutants to an interconnected permitted MS4, discharge to sensitive water bodies, and/or a significant contributor of pollutants to waters of the United States.

These factors are to be considered when evaluating whether a Small MS4 should be required to implement a storm water program that meets the provisions of the General Permit. An MS4 and the population that it serves need not meet all of the factors to be designated. Therefore, the City is an entity (or Small MS4) subject to this Phase II General Permit, due to the fact that the City meets most of the factors considered by the SWRCB and RWQCBs and is automatically designated by the EPA as a regulated Small MS4 in Region 3.

The City is located in the foothills of the California Central Coast, just east of the Santa Lucia Mountain Range in the northern portion of San Luis Obispo County (see Figure 1). It is home to a variety of industries and recreational areas. This portion of central western California generally has hot, dry summers and low rainfall, characteristic of Central California inland valleys. The Pacific Ocean is 20 miles west of the City; this proximity to the coast exerts a moderating influence on seasonal temperature fluctuations which is negated somewhat by the mountainous terrain to the west.

The mean elevation is 720 feet above sea level. Land area is about 18 square miles or 11,500 acres (city limits). Located alongside the Salinas River the City borders the southern end of the Salinas Valley. Humidity is low and the average rainfall is 13 inches (more to the west, less to the east).

The City has seen sustained growth since 1993. The average real growth during the 1997 to 2000 time frame was 10.6 percent. In January 2002, the population was approximately 25,800 residents. The expected growth is between 3.5 and 3.6 percent in 2002 and 2003 (*2002 City of Paso Robles Economic Update* by UCSB Economic Forecast Project).

Population	Paso Robles
2000 Census	24,297
1990 Census	19,201
Growth 1990-2000	26.54%

2.1 LAND USE

Highway 101 and the Salinas River traverse the City in an approximate north-south direction. Highway 46 passes through the City in an east-west direction. Under the adopted General Plan, the Community expects growth to about 35,000 people within the existing City boundaries by 2010. The land use in the City is a combination of agriculture, residential, commercial, office professional, industrial, public facilities, and parks and open space. Residential land uses make up the single largest land use category in the City. Existing residential designated land uses comprise approximately 72 percent of the total designated City acreage. Runoff from agricultural areas in the unincorporated areas including vineyards, orchards, and grazing lands drains through the City's MS4.

Commercial and industrial land uses in the City are located primarily in the vicinity of Downtown Paso Robles, the Commerce Industrial Park, and the Municipal Airport. Municipal land uses include a variety of City facilities that the City manages. Typically, the City hires a private contractor to conduct landscape maintenance (including watering, trimming, lighting, etc.) for the city-owned facilities. These facilities are located throughout the City (see Figure 2), and are described in more detail in Section 9.0.

2.2 SALINAS RIVER WATERSHED

Paso Robles is located in the Salinas River watershed. Due to the fact that the Salinas River traverses south to north through Paso Robles, all land uses are adjacent to the river (see Figure 4). The river originates in north San Luis Obispo County and flows northwesterly into Monterey County through the Salinas Valley and empties into Monterey Bay, totaling approximately 180 miles (290 kilometers). The flow is seasonal and is dictated by localized rainfall. Mean monthly flows are commonly in excess of 400 cubic feet per second (cfs) during January through April, but the river rarely contains any measurable flow in June through November.

The Salinas River drains a large watershed with a number of distinct tributaries. The main tributaries are the Arroyo Seco, Nacimiento, San Antonio, and Estrella Rivers. Nacimiento and Estrella Rivers are displayed in Figure 4, as they are closer to Paso Robles than the other main tributaries of the watershed. There are several smaller creeks and drainages near and within the City that are not shown in Figure 4. Despite the fact that some of the smaller waterways are unnamed, their locations are disclosed in Figure 5. The two primary ground water basins within the watershed are the Salinas Valley Ground Water Basin and the Paso Robles Ground Water Basin. The watershed has three dams: one on the upper Salinas River south of Santa Margarita, one on the Nacimiento River, and one on the San Antonio River.

The upper watershed begins at the headwaters of the Salinas River in the La Panza Range southeast of Santa Margarita Lake in San Luis Obispo County and flows to the narrows area near Bradley, just inside Monterey County. The upper watershed overlies the Paso Robles Ground Water Basin and lies mainly in San Luis Obispo County. The lower watershed extends from the Bradley narrows area to Monterey Bay and includes the drainage of the Arroyo Seco River. The lower Salinas River watershed overlies the Salinas Ground Water Basin and is entirely within Monterey County.

Agriculture is the primary land use within the Salinas River watershed. Grazing and pasturelands and dry land farming have historically been the dominant land use in the upper watershed. The rapidly expanding wine-producing region in the upper watershed around Paso Robles is also becoming a highly productive agricultural area.

Urban development occurs primarily in a corridor along the Salinas River. Urban development in the upper watershed is occurring in the smaller cities of Santa Margarita, Atascadero, Templeton and Paso Robles, which are also growing rapidly.

2.2.1 Water Quality

Available monitoring data, although not exhaustive, indicate water quality impacts in the Salinas River watershed are widespread and are primarily associated with agricultural land uses and groundwater pumping. Urban runoff has not been identified as a source of water quality impairments in the Salinas River watershed. The RWQCB identified that impacts include seawater intrusion in the coastal areas near Castroville and Salinas, nitrates in ground water and surface water, pesticides in sediment and animal tissues, mercury in Lake Nacimiento and its tributaries, and erosion and sedimentation. The Paso Robles Ground Water Basin includes an area where highly mineralized geothermal wells contribute to ground water pollution. Pollutants such as pesticides, nutrients and sediment are often associated with agricultural activities, although agriculture is not the only source. Other pollutant sources in the watershed are urban storm water runoff, mines, oil fields, geothermal areas, roads and highways, and point source discharges (Central Coast Region Basin Plan).

The Salinas River and several tributaries have been listed by the Regional Board on the Clean Water Act's 303(d) list of impaired water bodies. The pollutants currently listed on the 303(d) list include nutrients, pesticides, salinity/total dissolved solids/chlorides, and sedimentation/siltation. The predominant potential source is listed as agriculture and related sources. However, pesticides and sedimentation/siltation list nonpoint sources as a potential source.

Impaired water bodies are those waters that do not fully support all of their designated beneficial uses. All water bodies on the 303(d) list are scheduled for development and implementation of Total Maximum Daily Loads (TMDLs) within the next several years. Developing and implementing a TMDL is a process that includes identification of sources and allocation of load reductions needed to restore beneficial uses. The only impaired water body within Paso Robles jurisdiction is the upper portion of the Salinas River. Sources of impairment include chloride and sodium, potentially from agriculture (specifically from pasture grazing and/or upland urban runoff/storm sewers). However, the TMDL priority has been classified as low on the 303(d) list.

In January 1999, the RWQCB's Regional Monitoring Program began monitoring the Salinas River and some of its tributaries to provide current ambient water quality data. In addition, the Regional Monitoring Program has gathered water quality data from numerous agencies and has created a complete bibliography of references and a database of water quality data for the Salinas River.

The RWQCBs are required to develop water quality control plans (Basin Plans) that describe the RWQCB's approach for protection of water quality. Basin Plans identify beneficial uses for all of the region's water bodies, including rivers, streams, bays, estuaries, wetlands and

ground water basins, and establish standards for water quality that ensure beneficial uses are protected. The Central Coast RWQCB's Basin Plan lists twenty-two beneficial uses for the water bodies of the region, including drinking water supply, agricultural water supply, recreation, aquatic habitat, fish migration, and fish spawning. Twenty of the listed beneficial uses are applicable to the Salinas River watershed.

The historical focus of the RWQCBs has been on controlling point source pollution, primarily through a system of state and federal permits. Several recent events have put much greater emphasis on controlling nonpoint sources. Implementation of TMDLs in the Salinas River Watershed will focus on greater control of nonpoint source pollution, primarily agricultural sources.

2.3 POLLUTANTS OF CONCERN

Based on information in the Central Coast Basin Plan and current 303(d) list for water bodies within Paso Robles jurisdiction, the City has identified pollutants of concern. Table 2-1 describes the pollutants and possible sources of these pollutants.

TABLE 2-1
POLLUTANTS OF CONCERN

Pollutant of Concern	Possible Source
Chloride	Agriculture
Nutrients	Agriculture, residential areas
Sedimentation/siltation	Agriculture, construction sites, unvegetated slopes
Sodium	Agriculture

Reducing these pollutants in water bodies within Paso Robles is one of the goals of the SWMP. As the 303 (d) list is updated and new TMDLs are adopted or existing TMDLs are eliminated, the City will revise the SWMP as necessary to incorporate applicable TMDL requirements.

SECTION 3.0 IMPLEMENTING THE STORM WATER MANAGEMENT PLAN

This section briefly describes the City department responsible for implementing each BMP, and the timeline and legal authority under which the SWMP will be implemented. The City will implement this SWMP over the next five years, as required by the Phase II General Permit.

3.1 CITY DEPARTMENTS AND COORDINATION

The key City departments identified in Table 3-1 have the primary responsibility for day-to-day implementation of the SWMP. The overall City management is summarized in Figure 3 (the City Organization Chart).

The City seeks to work closely with the RWQCB through annual reporting, notification of noncompliance, notification of spills and illicit connections/discharges, and through both formal and informal meetings. The City will also coordinate with the public through three primary mechanisms:

- Public contact with the City's offices regarding complaints, suggestions, and requests
- Public review of the annual report preparation process
- Public input on proposed projects during the environmental evaluation process

3.2 TIMELINE

This SWMP is submitted to the Central Coast RWQCB in accordance with the timeline established by the final NPDES Phase II rule. The final Phase II rule requires that the City submit a Notice of Intent (NOI) and SWMP to the Central Coast RWQCB on or before March 10, 2003. The RWQCB then approves this plan and grants coverage under the General Permit. The SWMP will be revised to adopt and incorporate any new measurable goals developed by the City or any revised measurable goals identified through the City's continuous improvement process.

The SWMP will be implemented over the next five years (from 2004 to 2009) as detailed in Sections 4.0 through 9.0. Each minimum control measure and associated best management practices (BMPs) included in this SWMP have their own implementation schedule, based on City funding and program priorities. Table 3-1 at the end of this section summarizes the BMPs and the associated implementation schedule, and assigns the responsibility of implementing each BMP to specific City departments.

3.3 LEGAL AUTHORITY (ENFORCEMENT)

The City's legal authority to enforce this SWMP includes the General Plan, City ordinances, the building and development plan review process, Standard Design and Specifications, and

solid waste regulations. In order to establish adequate legal authority, the City intends to modify parts of the General Plan, ordinances, and other codes as part of its implementation schedule (see Table 3-1). The City will maintain adequate legal authority to implement and enforce the SWMP, including right of entry/inspection, designed to reduce the discharge of pollutants from the MS4 to protect water quality to the MEP.

The primary City staff enforcement for the SWMP includes the Public Works and Community Development Departments. Public Works staff enforces all construction and capital improvement projects and responds to any illicit discharges from existing facilities. The Community Development staff enforces all private construction projects. Lastly, the City Attorney plays an enforcement role by reviewing all revisions to ordinances and litigating any violations.

3.3.1 General Plan

The General Plan is the City's statement of policies for guiding decisions regarding its physical development over the next 20 years. The geographic area addressed by the General Plan includes the existing City limits as of January 1, 1991 plus a Planning Impact Area around the City. The Plan consists of policy statements and accompanying officially adopted maps. The term "policy statement" includes goals, policies and programs. The General Plan provides a process for making informed decisions to guide ongoing improvement of its economic health, including preservation of the physical environment. The General Plan addresses the following goals and policies related to water quality management:

- It is a City Goal stated in the General Plan to have a system of government that encourages public participation.

- Implementing proper design standards, avoiding soil erosion, and grading restrictions to minimize sediment transport are discussed in the Land Use section of the General Plan, under "Geology and Soils."

- Solid waste disposal is addressed relating to the City's landfill and the City's participation in the County's Solid Waste Management Plan.

- Policy PS-7 calls for storm drain systems that efficiently and safely convey run-off to the Salinas River, Huerhuero Creek, or detention basins in order to reduce flooding, and the Storm Drainage Master Plan is defined.

- The use of storm water for irrigation is encouraged in Policy PS-5.

3.3.2 Ordinances

Municipal Code ordinances that provide a baseline for satisfying the Minimum Requirements of the Phase II General Permit are found in Title 7 Health and Sanitation, Title 9 Public Safety, Title 11 Streets and Sidewalks, Title 14 Water and Sewers, Title 17 Building and Construction, and Title 20, Grading. Each of these ordinances is discussed in Section 7.0.

3.3.3 Zoning

The City's zoning ordinance and corresponding zoning maps promote the growth of the City in an orderly manner and protects the public health, safety, comfort, and general welfare. Zoning ordinance requirements implement the goals and policies of the General Plan. The ordinance consists of the establishment of various districts, including all the territory within which the use of land and buildings and the height and bulk of buildings are regulated.[1]

3.3.4 Building and Development Plan Review Process

The City's Zoning Ordinance (Chapter 21.23B) defines the general permitting process, which prescribes three levels of review for any development plan within the City: 1) Plot Plan – a staff level, ministerial review for simple projects: single family residences, additions to multi-family residences, minor additions to commercial and industrial buildings. 2) Site Plan – a semi-discretionary review by the City's Development Review Committee (a subcommittee of the Planning Commission) for projects that are exempt from the California Environmental Quality Act (CEQA), but more complex than plot plan review items: single family dwellings on hillside lots; multi-family dwellings up to 4 per lot; commercial and industrial buildings less than 10,000 sq ft. 3) Development Plan – discretionary review by the Planning Commission for projects subject to CEQA: multi-family residential with 5 or more units, commercial and industrial buildings larger than 10,000 sq ft. 4) Additionally, some land uses are subject to approval of a conditional use permit, which is a discretionary process, requiring a public hearing before the Planning Commission.

3.3.5 Standard Details and Specifications

The Standard Details and Specifications provide the City with minimum enforcement standards for the design, methods of construction, kinds and uses of materials, and

[1] No building or structure within the City can be developed, reconstructed, or structurally altered in any manner, nor shall any building or land be used for any purpose other than as permitted by the zoning ordinance. Any violation or nonconformance to the zoning ordinance results in a misdemeanor and is punishable by a fine of not more than five hundred dollars or by imprisonment in jail. Any building or structure erected, altered, or moved contrary to the provisions of the zoning ordinance and any use of any land, building, or premises established or operated contrary to the ordinance is unlawful. (City zoning ordinance)

preparation of plans for construction within the City. The City Engineer may require certificates of compliance with these specifications from whoever is performing the work.

3.3.6 Solid Waste Regulations

San Luis Obispo County's Integrated Waste Management Board (Board) is responsible for ensuring that State waste management programs are primarily implemented through Local Enforcement Agencies (LEAs). The City is the designated LEA for Paso Robles Landfill. As the LEA, the City has the primary responsibility for ensuring the correct operation and closure of solid waste facilities in the city and they also have responsibilities for guaranteeing the proper storage and transportation of solid wastes that could pollute storm water. The City's landfill is not a part of this SWMP due to the fact that it is already regulated under the Phase I General Permit.

3.3.7 Non-Storm Water Discharges

The City's non-storm water discharges are addressed by this SWMP and in another General NPDES Permit. This section summarizes the City's approach to addressing non-storm water discharges and the potential to pose a threat to water quality standards and beneficial uses.

- **Potable Water** – The City addresses potential effects to water quality standards and beneficial uses from potable water (i.e., street and sidewalk washing, car washing, etc). Specific BMPs that address this issue include Public Education (PE) – 3 and Good Housekeeping (GH) – 1.
- **Water Line Flushing** – The City addresses potential effects from water line flushing in part through coverage under another General NPDES Permit (Order No. 01-119), as discussed Section 3.4, and also in specific BMPs in this SWMP [Construction Site Storm Water Control (CS) – 3].
- **Dechlorinated Swimming Pool Discharges** – The City addresses potential effects from swimming pool discharges in this SWMP in BMPs PE -3 and GH -1.
- **Landscaping Irrigation, Irrigation Watering, Lawn Watering** – The City addresses all landscaping issues in BMPs PE-3 and GH-1.
- **Groundwater** – Rising groundwater has not been an issue of concern for the City and therefore is not addressed further in this SWMP. As described in the Paso Robles Groundwater Basin Study, the Estrella subbasin, which underlies the City, has observed a steady decline in water levels and storage since 1980. Springs have also not been a source of water quality or beneficial uses degradation in the past.

  As a result of the December 22, 2003, "San Simeon" earthquake a natural spring surfaced adjacent to City Hall. Currently the water associated with this spring is being pumped into the City's storm drain system, which discharges to the Salinas River.

- **Diverted Stream Flows** – Prior to the December 2003 earthquake the City did not have any diverted stream flows. As mentioned above, the groundwater associated with the natural spring generated as a result of the San Simeon earthquake is diverted to the City's storm drain system, which discharges to the Salinas River.

3.4 EXISTING BMPs

There are several existing ordinances, practices, and programs that are currently implemented by the City, which satisfy some of the Minimum Requirements of the SWMP (see Table 3-2 at the end of this section). The City presently adheres to the RWQCB General NPDES Permit for Discharges with Low Threat to Water Quality (Order No. 01-119, NPDES No. CAG 993001). The permit applies to locations throughout the Central Coast Region, and to many types of waste discharges with very low pollutant content and with no likely adverse effect on water quality, including, but not limited to:

- Maintenance and hydrostatic testing of water supply wells, tanks and pipelines;
- Fire hydrant testing or flushing;

The Central Coast Regional Water Quality Control Board adopted this General NPDES Permit for Discharges with Low Threat to Water Quality on December 7, 2001. This permit covers the City of Paso Robles until December 7, 2006. This permit covers some of the non-storm water discharges (e.g., maintenance flushing of the City's water distribution system) the City has that must be addressed by this SWMP. Permittees authorized to discharge under this permit at the time of expiration will automatically be re-enrolled under the reissued permit, unless a Notice of Termination or Transfer is submitted to terminate coverage.

As part of this permit, the City monitors effluent discharges in accordance with Order No. 01-119. To date the City is within the permit requirements for receiving water limits

The City also recently developed a web page, which offers a good source of public information, including storm drain maintenance. The City also promotes the Adopt-A-Street program, which requires the adoptee to pick up litter along a local street twice a month. The City also participates with the Integrated Waste Management Association (IWMA), of San Luis Obispo County, and also implements a Hazardous Materials/Spill Response Plan through the Emergency Services Department. Street sweeping is also managed by the City every four to five weeks.

These programs, in addition to other ordinances and policies, are summarized in Table 3-2. Specific BMPs that will be, or already are, implemented to satisfy the Minimum Requirements are also referenced. Where no existing program exists, refer to Table 3-1, where all existing and new programs/BMPs are identified.

3.5 IMPLEMENTATION OF THE SIX MINIMUM REQUIREMENTS

Sections 4.0 through 9.0 describe BMPs the City will employ or currently exist to meet the six Minimum Requirements in the General Permit to protect water quality. BMPs are defined as practical ways to initiate a runoff management program without heavy-handed regulatory requirements. BMPs are designed and implemented to reduce the discharge of pollutants from the City's storm drain system to the "maximum extent practicable" (MEP), and to control the discharge of pollutants from regulated construction projects by employing the best conventional and available technology. Each following section also describes the timeline for implementation, and the measurable goals that will be used to assess the effectiveness of each of the BMPs employed by the City.

SLIPSHEET

TABLE 3-1
BMP/MEASURABLE GOAL IMPLEMENTATION SCHEDULE

(11" X 17")

Table 3-1 BMP / Measurable Goal Implementing Schedule

ID	BMP #	BMP Description	Responsible City Dept.
1		**Public Education and Outreach**	
2	PE-1	Adopt-A-Street Program	Public Works
3	PE-2	Web page	City Manager
4	PE-3a	General storm water fact sheet	Community Development
5	PE-3b	Construction contractor brochure	Community Development
6	PE-3c	Business BMP brochure	Community Development
7	PE-3d	Illicit discharge fact sheet	Public Works
8	PE-4	Storm water hotline	Public Works
9	PE-5	Storm drain marking	Public Works
10	PE-6	Public event participation	Public Works
11		**Public Participation**	
12	PP-1a	Initial public meeting	Public Works
13	PP-1b	Public meeting updates	Public Works
14	PP-2a	Develop stock presentation	Public Works
15	PP-2b	Community stakeholder presentation	Public Works
16	PP-3	Web page comment form	City Manager
17	PP-4	Volunteer creek clean-ups	Public Works
18	PP-5	City employee training	Public Works
19		**Illicit Discharge Detection and Elimination**	
20	ID-1a	Enforcement Authorities	Public Works
21	ID-1b	Standard Details and Specifications Revision	Com Dev/Pub Works
22	ID-2	Hazardous materials/spill response & IWMA	Emergency Services
23	ID-3	Storm drain mapping	Public Works
24	ID-4a	Inspect outfalls	Public Works
25	ID-4b	Response to illicit discharge identification	Public Works
26	ID-5	Illicit discharge detection outreach	Public Works
27	ID-6	Illicit discharge ordinance	Public Works
28		**Construction Site Storm Water Control**	
29	CS-1a	Compliance with grading ordinance	Community Development
30	CS-1b	Revise grading ordinance	Community Development
31	CS-2	BMP manuals	Community Development
32	CS-3	Construction public outreach	Community Development
33		**Post Construction Storm Water Management**	
34	PC-1a	Inspection of storm water facilities	Community Development
35	PC-1b	General Plan revisions	Community Development
36	PC-2a	City construction projects	Public Works
37	PC-2b	Maintenance of existing water quality control measures	Public Works
38	PC-2c	Enforcement actions	Com Dev/Pub Works
39	PC-2d	Standard Details and Specifications revision	Com Dev/Pub Works
40	PC-3a	Development requirement policy/ordinance	Com Dev/Pub Works
41	PC-3b	Development requirements tracking	Community Development
42	PC-4	Permitting process	Community Development
43		**Good Housekeeping and Pollution Prevention**	
44	GH-1	Facility maintenance	Public Works
45	GH-2	Integrated waste management	Public Works
46	GH-3	Facility surveys	Public Works
47	GH-4	Facility BMP fact sheets	Public Works
48	GH-5	Employee training	Public Works

Date: Thu 1/6/05

Existing BMPs | Additional BMPs | Summary | External Tasks | Deadline

Split | Milestone | Project Summary | External Milestone

TABLE 3-2
EXISTING CITY PROGRAMS

Minimum Requirements (Control Measures)	Existing Ordinances/Policies/Programs	Applicable BMP
Public Education		
Focus on impacts of storm water discharges on water bodies.	**Web Page**: The City's web page (www.prcity.com) currently offers information on various departments, including storm drain maintenance. An "Action Request Form" is currently provided to allow the community to report a clogged storm drain, spills, or illegal dumping.	PE-2, PE-3a, 3d, PE-4, PE-5
Identify and publicize steps that the public can take to reduce pollutants in storm water runoff.	**Adopt-A-Street Program**: The program gives individuals, companies, schools or organizations an opportunity to adopt a City street and beautify/clean a part of the City. Adoption requires litter pickup on a section of the street twice a month for six months.	PE-2, PE-3a, 3b, 3c, 3d, PE-4
Public Participation		
Comply with public notice requirements, allow public review, and receive and respond to public comments.	A City Council/Public Meeting will be held to review the SWMP prior to implementation.	PP-1a, 1b, PP-2a, 2b
Encourage the public to be involved in developing/refining the SWMP.	It is a City Goal stated in the General Plan to have a system of government that encourages public participation.	PP-3, PP-4
Illicit Discharge Detection/Elimination		
Develop a MS4.	**No existing program. City proposes to produce map.**	ID-3
Develop a plan to detect and address non-storm water discharges.	**No existing plan. City proposes to implement plan.** However, the City does have authority for avoiding, detecting and eliminating illicit discharges and illegal connections, as referenced in the Grading Ordinance, Zoning Ordinance, Water and Sewers Ordinance, and the City Engineering Standard Details and Specifications (Public Works).	ID-2, ID-4a, 4b, ID-5
Inform public employees/businesses/general public of hazards associated with illegal discharges.	City participates with Integrated Waste Management Board (SLO) and the Emergency Services Department for Hazardous Materials/Spill Response.	ID-1, ID-2, ID-5
Adopt an ordinance/policy/enforcement procedures to prohibit non-storm water discharges.	Title 11, Sections 11.24.010 and 11.24.040, Ordinance 129 N.S.	ID-6

TABLE 3-2 (CONTINUED)
EXISTING CITY PROGRAMS

Minimum Requirements (Control Measures)	Existing Ordinances/Policies/Programs	Applicable BMP
Construction Site Storm Water Control		
Prevent/minimize water quality impacts from storm water runoff from construction sites. Applies to all construction projects that disturb greater than/equal to one acre and that discharge into the MS4.	Grading Ordinance (Title 20) and Building and Construction Ordinance (Title 17) of City's Municipal Code, and Construction Guidelines of the City's Standard Details and Specifications	CS-1, CS-2
Include an ordinance/policy to require erosion and sediment controls.	Grading Ordinance (Title 20), Chapter 20.20	Already exists
Implement BMPs that utilize Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or eliminate storm water pollution.	Grading Ordinance (Title 20) and Building and Construction Ordinance (Title 17) of City's Municipal Code, and Construction Guidelines of the City's Standard Details and Specifications	Already exists
Preconstruction site plan and BMP review.	Standard Specifications and Details, Sections II-8 and II-9	Already exists
Receipt of and response to information submitted by the public.	John Falkenstein, City Engineer, receives calls from public	Already exists
Site inspection and enforcement of control measures.	Standard Specifications and Details, Section III.	Already exists
Post-Construction Storm Water Management		
Minimize the long term impacts of storm water runoff from new development and redevelopment projects that disturb at least one acre.	The City Municipal Code (Titles 7, 11,14, 17, and 20) defines procedures and ordinances, which are further defined by the City's Engineering Specifications. Also, in the City's General Plan, Policies OA-6, OA-7, OA-9, and OA-10 help protect storm water quality.	Already exists

TABLE 3-2 (CONTINUED)
EXISTING CITY PROGRAMS

Minimum Requirements (Control Measures)	Existing Ordinances/Policies/Programs	Applicable BMP
Design BMPs must prevent/minimize water quality impacts. (Include structural and/or non-structural BMPs and adopt/enforce an ordinance/policy that requires projects to include the incorporation/long-term operation and maintenance of long-term BMPs).	The City Municipal Code (Titles 7, 11,14, 17, and 20) defines procedures and ordinances, which are further defined by the City's Engineering Specifications. Also, in the City's General Plan, Policies OA-6, OA-7, OA-9, and OA-10 help protect storm water quality.	PC-2a, 2b, 2c
Pollution Prevention/Good Housekeeping		
Prevent/reduce pollutants in runoff from municipal operations.	Municipal Code, Title 7 (Health & Sanitation), Title 9 (Public Safety), Title 11 (Streets and Sidewalks), Title 14 (Water & Sewers), Title 17, (Building and Construction) and the City's Engineering Specifications. Also, the City hires a private contractor who conducts landscape maintenance and adheres to technical specifications regarding litter, walkways, irrigation, pest control, etc.	GH-1, GH-2, GH-3, GH-4, GH-5
Consider all municipal activities and ID those that may contribute pollutants to storm water, select and implement BMPs to reduce/eliminate the pollutant contributions.	Street sweeping takes place every 4-5 weeks, storm drains are maintained on an as-needed basis, open channels and surface areas are cleaned every August/Sept. by public works. **City proposes to implement BMP to conduct facility surveys to ID those that may contribute pollutants to storm water**.	GH-3, GH-4
Train new/existing employees about the impacts of storm water pollution from municipal activities.	**No existing training procedures. City proposes to implement procedure.**	GH-5

The first of the six Minimum Requirements defined in this SWMP is Public Education and Outreach. The goal of the Public Education and Outreach control measure is to educate the public about the importance of the City's Storm Water Program and describe the public's role in the program. The City will educate the public through a series of BMPs that increase awareness of the role each community member plays in protecting storm water quality.

Typically "public education" refers to a curriculum-based program whereas "public outreach" refers to programs that disseminate information. There have been many successful storm water public education and outreach materials created and it is the City's intent to rely more on existing materials, rather than create new materials.

4.1 MINIMUM REQUIREMENTS

To meet the Minimum Requirements the Phase II General Permit requires the following:

> "The Permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impact of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff."

EPA guidelines further define the Minimum Requirements as:

> A Small MS4 should "implement a public education program to distribute educational materials to the community, or conduct equivalent outreach activities about the impacts of storm water discharges on local water bodies and the steps that can be taken to reduce storm water pollution."

Both agencies require that MS4s distribute information regarding the impacts of storm water on water quality as a result of people's actions, whether at work washing out floor mats or at home washing their car in their driveway. The intent is that if the community were educated they would change their behavior and water quality would be improved.

4.2 BMPs

The following BMPs are either existing or will be implemented by the City within the next five years, upon approval of this SWMP, to satisfy the minimum requirements of Public Education. These BMPs will be implemented to educate the community about the MS4, and how it leads directly, without treatment, to local creeks and rivers. The BMPs in this section do not address specific pollutants of concern. However, it is the City's intent that these BMPs would support the overall program in educating the public about the purpose and goals of the program, namely to reduce pollutants to the Maximum Extent Practicable (MEP). Although

the following BMPs do not necessarily have a direct correlation to pollutants, they will have an indirect effect on the pollutants of concern. The BMPs below are numbered as PE (Public Education) BMPs. The Public Education and Outreach BMPs are summarized in Table 4-1.

4.2.1 Existing BMPs

PE-1 Adopt-A-Street Program: The Adopt-A-Street Program is an existing City program that gives individuals, companies, schools or organizations an opportunity to adopt a street and beautify a part of Paso Robles in partnership with the City. Adoption requires litter pickup on a section of a City street a minimum of twice a month for six months. This is an effective way to promote community pride and goodwill within an organization, and among family and friends. The program has a net benefit of improving water quality by keeping adopted streets free of litter.

Measurable Goal

The City will educate the community about water quality issues and their role in the solutions through outreach to residents and businesses. The measurable goal for PE-1 is below:

PE-1 Adopt-A-Street Program: Maintain the existing program levels and expand the program by at least 25 percent. The City will provide further information regarding the benefits of protecting water quality (through water quality brochures and fact sheets) to those who adopt streets. The number of water quality brochures/fact sheets distributed will be tracked, as well as the number of adopted streets that are inspected twice a month and effectively cleaned, throughout the term of the SWMP program. Beginning in Year 3, the City will conduct a survey at the end of each fiscal year on those who adopted streets to assess effectiveness of distributed information.

PE-2 Web Page: The City's web page www.prcity.com currently offers information on various departments, City Council agendas, including storm drain maintenance. An "Action Request Form" is currently provided to allow the community to report a clogged storm drain. Information is also provided on who should be called to report spills or illegal dumping into storm drains. The City will include information on the storm water program on their web page.

Measurable Goal

The City will educate the community about water quality issues and their role in the solutions through outreach to residents and businesses. The measurable goal for PE-2 is below:

PE-2 Web Page: Maintain and track the number of hits to the existing web page and add additional storm water program information before the end of Year 2. The City will continue to update the web page with additional information as it is developed. The City will implement a web page tool that allows staff to view visitor numbers specifically for the SWMP web page, and assess if the viewing hits increase or decrease per year in order to measure the level of public interest regarding storm water quality.

4.2.2 Additional Future BMPs

PE-3 Brochures and Fact Sheets: The City will develop brochures or fact sheets (or modify brochures and fact sheets from other agencies) to educate the community (residents, businesses, construction sector, and government) on ways they can decrease their impact on storm water runoff. The brochures will define the problem and describe the pollutants of concern, and provide examples of solutions to decrease these pollutants from getting into local water bodies. They will describe how the storm drain system flows directly to creeks and the Salinas River and how this impacts water quality, wildlife, public health, and eventually the quality of the life in the community. These brochures will be distributed at public events, to businesses when they get a business license and when developers or homeowners get approval for new development.

Many brochures and fact sheets have been developed throughout the state that already address these issues. The City will research which brochures best fit the local area and either request to use these brochures or modify them to suit Paso Robles. The City will translate each brochure into Spanish (as appropriate) to reach the Latino community.

Measurable Goal

The City will educate the community about water quality issues and their role in the solutions through outreach to residents and businesses. The measurable goal for PE-3 is below:

PE-3 Brochures and Fact Sheets:

A. Distribute an English/Spanish general storm water fact sheet to all residents in their water utility bill describing the storm drain system, water quality issues (i.e., swimming pool discharges, car washing, littering, yard maintenance, etc.), the local watershed, and how storm water pollution flows directly to the local creeks and rivers. Complete the fact sheet by the end of Year 2 and distribute to all residents by the end of Year 3. Track the number of brochures distributed and dates of distribution.

B. Develop a storm water brochure for construction contractors describing the City's BMPs for minimizing runoff from construction sites. The brochure will include information on the requirements for water line discharges and potential additional RWQCB permits required. The construction outreach brochure will be developed in Year 2 and distributed to all contractors (as part of the City's project permitting process) working on construction projects greater than one acre in size. Track the number of brochures distributed. The City will conduct at least two subsequent site inspections at these project sites to determine whether or not the contractors are implementing the measures discussed in the brochure.

C. Develop an English/Spanish storm water brochure for local businesses including information on specific pollution prevention measures businesses can employ to minimize storm water pollution and urban runoff. The brochure/fact sheet will address pollution prevention measures for potable water use including sidewalk washing, rinsing of restaurant floor mats, fire sprinkler flushing, landscape watering and irrigation, along with other potable water uses by businesses. The business outreach brochure will be developed and distributed in Year 2. Track the number of brochures distributed and dates of distribution. Beginning in Year 3, the City will conduct biannual inspections in order to assess the percentage of local businesses implementing pollution prevention measures at the end of each year.

D. Develop an illicit discharge fact sheet or brochure in Year 2 that describes the City's illicit discharge detection and elimination program (see Section 6.0 Illicit Discharge Elimination). Brochures will be distributed during public events and/or meetings and displayed at the City office. Track the number of brochures distributed.

PE-4 Storm Water Hotline: The City will provide a hotline number that residents, businesses and construction contractors can call to get more information on the storm water program, report water quality issues or get information such as where to

dispose of used motor oil. This number will be included in all public outreach and participation material.

Measurable Goal

The City will educate the community about water quality issues and their role in the solutions through outreach to residents and businesses. The measurable goal for PE-4 is below:

PE-4 Storm Water Hotline: Establish a storm water hotline number in Year 2 and document calls throughout the permit life. The hotline number will be included on all program materials for the remainder of the permit. The City will track the number of calls and the percent of calls that result in a City response to remedy a storm water pollution problem.

PE-5 Storm Drain Marking: The City will organize community groups to help mark each storm drain catch basins with "Don't Dump – Drains to River" markers.

Measurable Goal

The City will educate the community about water quality issues and their role in the solutions through outreach to residents and businesses. The measurable goal for PE-5 is below:

PE-5 Storm Drain Marking: Begin marking each storm drain inlet within the City by the end of Year 3. Continue to mark storm drain inlets until they are all marked. The City will track the number, the percent of the total and the location of the storm drains each year.

PE-6 Event Participation: The City will participate in local public events (Earth Day, festivals, etc.). The City will distribute information about the storm water program at the events that it attends.

Measurable Goal

The City will educate the community about water quality issues and their role in the solutions through outreach to residents and businesses. The measurable goal for PE-6 is below:

PE-6 Event Participation: Distribute program materials at public events the City already attends for other programs (recycling, street maintenance, etc.) starting in

Year 1. Develop a list of public events in Year 1, where information can be distributed. Develop a storm water display in Year 2 for use at public events. The City will track the number of public events where program materials are distributed, as well as the number of fact sheets/brochures distributed.

4.3 REPORTING

The City will record the amount of public education materials that are distributed. This will include the number of brochures/fact sheets distributed, number of hits on the web page, number of storm drain inlets marked, and number of calls to the hotline. The progress in implementing the public education and outreach control measure will be documented in annual reports.

Measurable goals may be adjusted, if necessary. Any proposed changes to the SWMP will be presented to the RWQCB, along with justification for the change. The Board will need to approve any changes before they are implemented.

Public Education and Outreach
Table 4-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
PE-1	Adopt-A-Street Program	Maintain the existing program levels and expand the program.	Year 1, 2nd Quarter	Ongoing	# and % of increase in streets adopted (minimum of 25%)	# of adopted streets that are inspected twice a month and effectively cleaned
		Provide further information on the water quality benefits of the program to those who adopt streets.	Year 1, 2nd Quarter	Ongoing	# of water quality brochures/fact sheets distributed to those who adopt streets	Conduct survey to those who adopted streets to assess understanding and effectiveness of distributed information
PE-2	Web Page	Maintain and track the number of hits to the existing web page and add additional SWMP information. The City will continue to update the web page with additional information as it is developed.	Before end of Year 2	Ongoing	Whether or not the web page was maintained/updated and whether or not 'hits' were counted	Implement a web page tool that allows the City to view web page hits specifically for the SWMP web page, and assess if the hits increase or decrease per year
						# of hits to the existing web page, as well as the % increase/decrease per year
PE-3	Brochures and Fact Sheets	Distribute English/Spanish storm water fact sheet to residents in their water utility bill describing the storm drain system, water quality issues, the local watershed, and how storm water pollution flows directly to the local creeks and rivers. Complete the fact sheet by the end of Year 2 and distribute to all residents by the end of Year 3.	Year 2	1x	Whether or not fact sheet was completed	
			Before end of Year 3	1x	# and % of brochures distributed to residents, and dates of distribution.	
		Develop a storm water brochure for construction contractors describing the City's BMPs for minimizing runoff from construction sites. The brochure	Year 2	1x	Whether or not storm water brochure for construction contractors was developed	# of contractors who implement items discussed in the brochure

Public Education and Outreach
Table 4-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
		will be developed in Year 2 and distributed to all contractors (as part of the City's project permitting process) working on construction projects greater than one acre in size.		Ongoing	# and % contractors receiving brochures	
PE-3	Brochures and Fact Sheets	Develop an English/Spanish storm water brochure for local businesses including information on specific pollution prevention measures businesses can employ to minimize storm water pollution and urban runoff.	Year 3	1x	Whether or not an English/Spanish storm water brochure for local businesses was developed	% local businesses implementing pollution prevention measures by the end of each year
			Year 3	Ongoing	# of businesses receiving brochures, and dates of distribution	
		Develop an illicit discharge fact sheet or brochure that describes the City's illicit discharge detection and elimination program (see Section 6.0 Illicit Discharge Elimination) and distribute to the public.	Year 2	Ongoing	Whether or not illicit discharge fact sheet or brochure was developed	
					# of households/persons receiving brochures	
PE-4	Storm Water Hotline	Establish a storm water hotline number and put hotline number on all program materials for the remainder of the permit.	Year 2	Ongoing	Whether or not hotline established and number put on all program materials after Year 2	% of calls that result in a City response to remedy a storm water pollution problem or sending out public education materials
						# and nature of calls throughout the permit life

Public Education and Outreach
Table 4-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
PE-5	Storm Drain Marking	Begin marking each storm drain inlet within the City by the end of Year 3. Continue to mark storm drain inlets until they are all marked.	Year 3	Ongoing	#, % of total, and location of storm drains marked each year	
PE-6	Event Participation	Distribute program materials at public events the City already attends for other programs (recycling, street maintenance, etc.) starting in Year 1. Develop a list of public events in Year 1, where information can be distributed. Develop a storm water display in Year 2 for use at public events.	Year 1	Ongoing	# of public events where program materials are distributed, and # of fact sheets/brochures distributed	General awareness of the City's storm water program by the public (determined by comments made at public events)
			Year 2	1x	Whether or not storm water display was developed for use during Year 2	

The first goal of the Public Participation and Involvement control measure is to raise public awareness about urban runoff pollution through involvement in the City's Storm Water Program. The second goal is to involve the public in the development and implementation process to secure "buy in" and generate public support for the City's water quality protection efforts. The BMPs in this section do not address specific pollutants of concern, however, it is the City's intent that these BMPs would support the overall program in educating the public about the purpose and goals of the program, namely to reduce pollutants to the MEP. In addition, these BMPs will have an indirect effect on water quality through public participation in the City's SWMP.

5.1 MINIMUM REQUIREMENTS

The General Permit requires the following to meet the Minimum Requirements:

> The Permittee must at a minimum, comply with state and local public notice requirements when implementing a public involvement/participation program.

EPA guidelines further define the minimum requirements as:

> Operators of regulated Small MS4s should include the public in developing, implementing, and reviewing their SWMPs. The public participation process should make every effort to reach out and engage all economic and ethnic groups.

Both agencies require that MS4 operators involve the public in the development, implementation, and regular reviews of their SWMPs. The intent of public involvement is that the public or community can provide valuable input and so the community understands and acknowledges the City's SWMP.

5.2 BMPs

The following BMPs are either existing or will be implemented by the City within the next five years, upon approval of this SWMP, to satisfy the minimum requirements of the Public Participation control measure. These BMPs will be implemented to involve program stakeholders (residents, chamber of commerce, businesses) to raise the awareness and gain the community's input in the City's SWMP. The BMPs below are numbered as PP (Public Participation) BMPs. The Public Participation BMPs are summarized in Table 5-1

PP-1 Public Meetings: The City will hold public meetings to provide updates on the storm water program and progress achieved. Public meetings will comply with state and local public notice requirements. The first public meeting will be held to present the draft storm water program to the community and to obtain input from residents,

businesses and community groups. Subsequent meetings will provide these groups with updates on the program and ways groups can get involved.

Measurable Goal

The City will involve the community in the development and implementation of the City's storm water program. Each of the BMPs will have an indirect effect on improving water quality by informing the public about the City's SWMP. The measurable goal for PP-1 BMP is below:

PP-1 Public Meetings:

A. The City will hold a public meeting to present the SWMP to the community, City Council and other City Departments and to receive comments on the draft program. This public meeting will be held in Year 1, upon approval of the SWMP. The number of public participants who attend the meeting will be recorded, as well as the number of comments received on the draft program, in order to assess the effectiveness of the meeting.

B. The City will hold two public meetings over the course of the next five years (in addition to the initial, informative SWMP meeting) to update the community, City Council and City Departments on the progress of the storm water program. The number of public participants who attend the meetings will be recorded, as well as the number of comments received on the progress of the program, in order to assess the effectiveness of the meeting.

PP-2 Public Presentations: The City will give presentations to various groups within the City, including the City Council, other City departments, community organizations/ groups, Chamber of Commerce, Building Industry Association [BIA], community clubs). The objective of these presentations is to convince the community of the need to protect water quality and to emphasize that the community is an important partner in protecting the environment.

Measurable Goal

The City will involve the community in the development and implementation of the City's storm water program. Each of the BMPs will have an indirect effect on improving water quality by informing the public about the City's SWMP. The measurable goal for PP-2 BMP is below:

PP-2 Public Presentations:

A. The City will prepare a "stock presentation" that informs the community about the need for and benefits of the storm water program and SWMP. The stock presentation will be prepared in Year 2 of the program.

B. The City will modify the stock presentation to focus on a specific community stakeholder. The City will conduct six presentations per year to community groups, beginning in Year 2, for a total of 16 community presentations throughout the life of the permit. The City will track the number of public participants at each presentation, as well as the percentage increase or decrease in participation over the course of the 16 presentations.

PP-3 Web Page: The City will add a comment form on the existing web page to take comments and suggestions on the SWMP.

Measurable Goal

The City will involve the community in the development and implementation of the City's storm water program. Each of the BMPs will have an indirect effect on improving water quality by informing the public about the City's SWMP. The measurable goal for PP-3 BMP is below:

PP-3 Web Page: The City will include a comment form as part of the City's web page in Year 2 of the program and respond to comments as necessary. The City will track the number of comments received from the public on the web page, as well as the percent of comments that result in a response from the City.

PP-4 Volunteer Creek Clean-Ups: The City will organize an annual creak clean-up day where community groups can help remove litter and debris from local creeks prior to the first storm event of the year. Volunteer groups will also be incorporated to take annual storm water samples along the Salinas River, which will be coordinated with existing regional programs.

Measurable Goal

The City will involve the community in the development and implementation of the City's storm water program. Each of the BMPs will have an indirect effect on

improving water quality by informing the public about the City's SWMP. The measurable goal for PP-4 BMP is below:

PP-4 Volunteer Creek Clean-Ups: The City will organize a volunteer-based creek clean-up day in the fall of Year 3 of the program and continue these clean-up days in subsequent years. The City will identify sampling locations early in Year 3 prior to organizing creek clean-ups, where water quality sampling will take place each year after the clean-up days.

The City will track the number of public participants at the Creek Clean-Up each year and the amount of trash/pollutants collected (number of bags collected). At the end of each year, the City will assess if there is an increase or decrease in the amount of trash collected, relative to the previous year. Results from the clean-up days and the subsequent storm water sampling will be summarized in the annual report.

PP-5 City Employee Training: The City will train staff with responsibility for implementing the storm water program. The training will provide an overview of each of the Minimum Requirements (Public Education and Outreach, Public Participation, Illicit Discharge Detection and Elimination, Construction Site Storm Water Runoff Control, Post-Construction, Development and Redevelopment Controls, and Pollution Prevention/Good Housekeeping for Municipal Operations) along with addressing the reporting requirements for each Minimum Requirements. Training will be provided on the Minimum Requirements that the employee is responsible for implementing.

Measurable Goal

The City will involve the community in the development and implementation of the City's storm water program. Each of the BMPs will have an indirect effect on improving water quality by informing the public about the City's SWMP. The measurable goal for PP-5 BMP is below:

PP-5 City Employee Training: The City will modify the "stock presentation" to focus on an overview of each of the minimum control measures in Year 2 of the program. Each City employee responsible for implementing the storm water program will receive training. Training will begin in Year 2. Any new employees will receive the training as part of the training for their position. City employees will help to find creative methods for improving water quality. The City will track the number of employees who attend each presentation, as well as the percent of employees trained by the end of each program year. The City will issue an exam to each employee

before and after the presentation and compare the results in order to assess the effectiveness of the presentation.

5.3 REPORTING

The City will document the level of community participation and feedback, and summarize this in the annual reports. Feedback from stakeholders and the web page comment form will be used to improve implementation of all six control measures. The progress in implementing the Public Information and Participation control measure will be documented in annual reports.

Measurable goals may be adjusted, if necessary. Any proposed changes to the SWMP will be presented to the RWQCB, along with justification for the change. The Board will need to approve any changes before they are implemented.

Public Participation and Involvement
Table 5-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
PP-1	Public Meetings	Hold a public meeting to present the SWMP to the community, City Council and other City Departments and to receive comments on the draft program.	Year 1 (upon approval)	1x	Whether or not a public meeting was held to present the SWMP	# of comments/suggestions on the draft program
						# of public participants who attend the meeting
		Hold two public meetings over the course of the next five years to update the community, City Council and City Departments on the progress of the storm water program.	Year 2 & Year 4	2x	Whether or not two public meetings were held over five years to update interested parties with SWMP progress	# of comments/suggestions on the progress of the program
						# of public participants who attend the meeting
PP-2	Public Presentations	Prepare a "stock presentation" that informs the community about the need for and benefits of the storm water program and SWMP.	Year 2	1x	Completion of presentation	
		Modify the stock presentation to focus on a specific community stakeholder. The City will conduct four presentations per year to community groups for a total of 16 community presentations throughout the life of the permit.	Year 2	4x/year (Ongoing)	# of presentations held per year for community groups	% increase or decrease in public participation at the community presentations
						# of public participants at each presentation
PP-3	Web Page	Include a comment form as part of the City's web page and respond to comments as necessary.	Year 2	Ongoing	Whether or not a comment form is included on the City's web page	% of comments that result in a response from the City
						# of comments received on the web page

Public Participation and Involvement
Table 5-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
PP-4	Volunteer Creek Clean-Ups	Organize a volunteer-based creek clean-up day. Identify sampling locations prior to organizing creek clean-ups. Results from storm water sampling will be summarized in the annual report.	Year 3, 1st Quarter	Ongoing	Whether or not clean-up day is organized, sampling locations are identified, and results are summarized	% increase or decrease in the total amount of trash/pollutants collected each year # of public participants at each clean-up day
PP-5	City Employee Training	Modify the "stock presentation" to focus on an overview of each of the minimum control measures. City employees responsible for implementing BMPs within each control measure will receive training. Training will begin in Year 2. Any new employees will receive the training as part of training for their position. City employees will help to find creative methods for improving water quality.	Year 2	Ongoing	Whether or not "stock presentation" was modified to focus on minimum control measures Total # and % of City employees (existing and new, with SWMP responsibilities) trained each year	Comparison of employee storm water exam results before and after training

The Illicit Discharge Detection and Elimination control measure is designed to prevent the discharge of pollutants to receiving waters. It requires the development and implementation of a system to identify and eliminate sources of illicit discharge and illegal dumping. The program depends on a number of partners including the public and other local agencies. The specific requirements for this program are described in detail below, followed by a discussion of the City's existing program BMPs, including measurable goals for determining effectiveness.

6.1 MINIMUM REQUIREMENTS

An illicit discharge is defined as "a point source discharge of pollutants to a MS4 which is not composed entirely of storm water and not authorized by an NPDES permit." Non-storm water discharges are classified as: "Illicit or Exempted. Improperly disposed of materials that enter the MS4 impact the environment and cause health and safety concerns." Discharge sources must be controlled and illegal behavior prevented. Controlling and eliminating illicit discharges through a comprehensive detection and abatement program can help in protecting the environment and public health and safety. Prevention can be enhanced through education on hazards and consequences of illegal disposal, provision of alternative disposal options and incentives, and through legal enforcement procedures.

As stated in the General Permit, the following requirements apply to this control measure:

> "Develop, implement and enforce a program to detect and eliminate illicit discharges into the (storm drain system)."
>
> "Develop a storm sewer system map, showing the location of all outfalls and the names and locations of all waters … that receive discharges from those outfalls."
>
> "To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the (storm drain system) and implement appropriate enforcement procedures and actions."
>
> "Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit."
>
> "Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste."
>
> "Address (specified) categories of non-storm water discharges … if you identify them as significant contributors of pollutants …".

The following discharges are exempted from being regulated discharges unless they are determined to be a significant source of pollution or a nuisance.

6.1.1 Exempted Non-Storm Water Discharges

The General Permit exempts the following non-storm water discharges from prohibition if they are not a significant source of pollutants:

- water line flushing
- landscape irrigation
- diverted stream flows
- rising ground waters
- potable water discharges
- foundation drains
- uncontaminated pumped ground water
- flows from riparian habitats and wetlands
- dechlorinated swimming pool discharges
- irrigation water
- springs
- water from crawl space pumps
- footing drains
- lawn watering
- street wash water
- air conditioning condensation
- individual residential car washing
- emergency fire fighting discharges

6.1.2 Municipal Separate Storm Sewer System

The primary source of information for the City's MS4 is the Storm Drain Report prepared by Central Coast Engineering of San Luis Obispo in 1976. The report contains general information about drainage basins around the City, recorded rainfall intensity, street surface flow patterns and the existing culvert locations at that time. Much of this information is now outdated due to the substantial amount of urban growth since the report was prepared.

The City included storm drainage standards in the Standard Details and Specifications for construction, published by the City's engineering division in 1995.

The City does not currently have a detailed map of the storm sewer system. As discussed in BMP ID-3, the City will develop a storm sewer system map as part of the Phase II Minimum Requirements of Illicit Discharge Detection and Elimination. While the production of storm drain system maps do not have a direct effect on water quality, they will be used to assess illicit connections and assist in preventing illegally dumped material from entering receiving waters. The storm drain atlas will also assist staff in identifying locations of all drain inlets, which may be the recipient of storm run-off within a particular watershed that may affect storm water quality.

6.2 BMPs

The following BMPs are either existing or will be implemented by the City within the next five years, upon approval of this SWMP, to satisfy the minimum requirements of the Illicit Discharge Detection and Elimination control measure. The BMPs below are numbered as ID (Illicit Discharge) BMPs. The Illicit Discharge BMPs are summarized in Table 6-1.

6.2.1 Existing BMPs

ID-1 Enforcement Authorities: The City currently has a number of ordinances prohibiting inappropriate waste disposal, including prohibitions against unpermitted discharge of liquid waste, and disposal of solid waste.

Authority for avoiding, detecting and eliminating illicit discharges and illegal connections are referenced or described in:

- City Grading Ordinance, which addresses the control of drainage and erosion, as well as the maintenance of protective devices such as drainage structures
- City Zoning Ordinance, which implements development review and permitting requirements that pertain to the control of drainage and erosion from development projects
- Ordinance No. 11.24.010 (Overflow into public place prohibited)
- Ordinance No. 11.24.020 (Connection to sewers, septic tanks)
- Chapter 14.18 (Water and Sewers)
- City Engineering Standard Details and Specifications (Public Works), which addresses sewer, water and storm drain plans

Additional water quality and pollution control issues that potentially impact storm water are addressed throughout the City's municipal codes. Potential storm water polluters, such as hazardous waste, animal waste, garbage, littering, and development and demolition activities are all addressed.

Measurable Goal

The following measurable goal for BMP ID-1 has been selected to ensure that illicit discharges are detected, eliminated and prevented to improve water quality:

ID-1 Enforcement Authorities:

A. The City will develop forms or a format for reporting public complaints or maintenance personnel actions regarding illicit discharges. This will facilitate assessing the City's implementation and adherence to the existing ordinances that prohibit inappropriate liquid waste and/or illegal connections. (This goal will be required to be reported as noted in Section 6.3). These forms/format will be developed in Year 1 and implemented throughout the term of the Phase II General Permit. These forms will identify the portion of the storm drain system impacted and any impacted water bodies. If water bodies are impacted, the City will report this information in the annual report, unless law requires prior reporting.

   A section at the bottom of the form will be included for public or personnel to provide comments on how the form/format can be improved. The City will track the number of comments/suggestions received on the forms as well as the number of public complaints or maintenance personnel actions that use the new forms at the end of each program year in order to measure the effectiveness of the new forms/format. City staff will review and consider the comments/suggestions at the end of each program year. In order to measure the effectiveness of the new forms, the City will calculate the percent of complaints/personnel actions that resulted in detecting or eliminating an illicit discharge.

B. The City's Engineering Standard Details and Specifications will be revised in Year 2 to address the Design Standards included within Attachment 4 of the General Permit, which includes receiving water limitations and design standards for specific types of development projects (addressed in more detail in BMPs CS-1, PC-1, PC-2, PC-3, and PC-4).

ID-2 Hazardous Materials and Waste Management: The City's existing programs for identification and elimination of illicit discharge sources is discussed below. The City's Emergency Services Department carries out the spill response, abatement and emergency control of hazardous conditions. The City also participates with the County's Public Health Department and Integrated Waste Management Board in programs that often relate to storm water management and pollution prevention.

In addition to these services, the City's Public Works Director and Street Maintenance Supervisor are the main points of contact for the general public to report a spill or make a complaint about potential polluting sources. The Street Maintenance

Supervisor responds to all storm drain maintenance needs and/or discharge concerns, and implements corrective measures.

Hazardous Materials/Spill Response: The City Department of Emergency Services holds a Regional Hazardous Materials Cooperative Agreement (Agreement) with San Luis Obispo County (County). Consistent with the Government Code section 6502.7 the public agencies of the County have authority to respond to hazardous materials emergencies and to operate and maintain equipment for hazardous materials response. Therefore, the agencies entered into a joint powers agreement on December 31, 1993 as a supplement to the County's Fire Services Mutual Aid Operation Plan of October, 1984, which provides for mutual aid response to hazardous materials emergencies (spills). The public agencies entered into this Agreement for the purpose of providing for the creation and establishment of a Regional Hazardous Materials Response Team (Team). The Team will carry out the abatement and emergency control of hazardous conditions and stabilize the same, until these conditions can be turned over the appropriate authority, for further disposal. This emergency response helps to keep contaminants from entering local water bodies. In the event that contaminants reach water bodies, control measures are in place to respond to and report these occurrences.

The Emergency Services Department has specific policies and procedures for "Initial Incident Actions" defined in their P&P Manual. The guidelines provide the fire officer faced with expected initial incident actions someplace to start on the most common incidents. The operational guidelines define general guidance in a step-by-step manner for the following incidents: structure fire incident, wildland fire incident, vehicle fire incident, vehicle collisions requiring extrication, hazardous materials incident, flammable liquid leak and power lines down. It is noted that the Chief of Emergency Services may deviate from this guideline when deemed necessary. Similarly, the Engine Company Fire Officer may deviate from this guideline if he/she feels the incident requires it. No guideline can possibly predict the variety of emergency incidents that may occur.

Integrated Waste Management: Paso Robles is located in northern San Luis Obispo County and participates with the County's Public Health Department and Integrated Waste Management Board. The Health Department works with organizations, businesses and regulatory agencies to protect the overall health of residents and visitors by preventing pollution in their environment. The Department's programs address some issues that are related to preventing storm water pollution. These relevant programs include the Liquid Waste Program, the Cross-Connection Program, the Hazardous Materials and Waste Program, and the Land Use Program.

The Liquid Waste Program protects the public and environment from the improper discharge of sewage and also manages a permitting and evaluation system (complaint response) for septage haulers. This program helps to keep raw sewage from entering local water bodies. This program is also relative to the Pollution Prevention/Good Housekeeping and Illicit Discharge Detection/Elimination requirements of the General Permit. The Cross-Connection Program enforces state and local regulations to protect the drinking water supply from chemical or bacterial contamination. This program also relates to the Illicit Discharge Detection/Elimination requirement. The Hazardous Materials/Waste Program protects the public and the environment from the release of hazardous wastes by regulating industries that generate hazardous waste. Program objectives are accomplished through inspection, surveillance, incident investigation, and assistance to industry, enforcement, and public education, which all apply to the minimum requirements and control measures of the General Permit. This program helps to identify potential releases of hazardous materials into the environment and keep them from entering water bodies. Lastly, the Land Use Program prevents health hazards and mitigates environmental degradation resulting from improperly planned land development projects. This program can help to satisfy the Construction Site Storm Water Control and the Post Construction Storm Water Management requirements of the General Permit.

Paso Robles Waste Disposal, the only franchised waste collection company within the City, provides residential and commercial waste collection.

The City has already implemented the BMPs (ID-1 and 2) listed above and additional ones, and will maintain this level of implementation as well as developing new efforts as deemed appropriate for the community (below). BMPs ID-1 and ID-2 currently help the City prevent pollutants (both pollutants of concern and other pollutants) from entering local water bodies.

Measurable Goal

The following measurable goal for BMP ID-2 has been selected to ensure that illicit discharges are detected, eliminated and prevented to improve water quality:

ID-2 Hazardous Materials and Waste Management: The City will develop forms or a format for reporting "incidents" involving hazardous waste, liquid waste, spills, etc. that could pollute storm water. These forms/format will be developed in Year 2 and will be similar to those developed for reporting public complaints or maintenance personnel actions (ID-1 Goal), and will be distributed to the Paso Robles Department of Emergency Services, the Fire Department, the Integrated Waste Management Board, and Paso Robles Waste Disposal. These departments/agencies

will be required to use these forms/format, as the City will use the completed forms for the annual report (see Section 6.3). The forms will identify the portion of the storm drain system impacted and any water bodies impacted. If water bodies are impacted, the City will report this information in the annual report, unless law requires prior reporting. The forms will be used to track the different types of illegal dumping within the City to develop further public outreach efforts and to assess what types of pollutants might be entering the City's storm drain system.

The City will track the number and types of forms developed, the number of incidents reported using the forms, and the percent of reports resulting in cleanup of a hazardous waste spill.

6.2.2 Additional Future BMPs

ID-3 Storm Drain Mapping: In order to satisfy requirements of the General Permit, and to ascertain the extent of the area covered by storm water collection drains, the City will survey and map the storm drain system with support from the Flood Control District and the Water Agency. The map(s) will include major pipes, outfalls, and topography and will delineate catchments. These maps will be used to assess illicit connections and to prevent materials from entering water bodies in the event of illegal dumping. The storm drain atlas will also assist staff in identifying locations of all drain inlets, which may be the recipient of storm run-off within a particular watershed that may affect storm water quality.

Measurable Goal

The following measurable goal for BMP ID-3 has been selected to ensure that illicit discharges are detected, eliminated and prevented to improve water quality:

ID-3 Storm Drain Mapping: The storm drain mapping effort will begin in Year 1 and will be completed by Year 4. As new development occurs, the City will update the storm drain mapping. City staff will make a note on the new "Complaint/Action" form (ID-1) when a storm drain map assists in identifying/locating an illicit discharge in order to measure the effectiveness/use of storm drain mapping.

ID-4 Identification and Elimination of Illicit Discharge Sources: In order to maximize the limited resources available, potential sources of illegal dumping and illicit connections will be identified and prioritized by the City based in part on public access to the area (or storm drain), characterization of nearby land uses as industrial, commercial and older residential areas, which all have high potential to be sources of

illicit discharge. This identification and prioritizing process will coincide with the City's effort to map the storm drain system. By identifying illicit discharges, the City will be able to better determine pollutants of concern that are potentially affecting water quality. Some pollutants of concern have already been identified and are listed in Table 2-1. By first identifying additional pollutants, other than those that have already been identified by the RWQCB, the City will amend or add BMPs to improve water quality to the MEP. In addition, the potential illicit discharge sources listed below will be evaluated on an on-going basis for their potential impacts to the storm water quality within the City's watershed:

- Accidents (spills, glass, etc.)
- Auto Shops
- Businesses Wash Down
- Commercial Irrigation
- Construction
- Carpet/Residential Cleaning
- Car Wash
- Cement Washing
- Equipment Cleaning
- Food Facility Cleaning (grey water, grease traps, dumpsters)
- Gas Stations/Vehicle Maintenance Stations
- Illegal Dumping (solids, liquids)
- Illicit Connections (Residential, Commercial, Industrial)
- Industrial Cooling Water
- Oil Drips/Fuel Leaks
- Paint
- Parking Lots
- Pools and Spas
- Residential (grey water, HazMat, pesticides, fertilizers)
- RV Waste
- Sewage Spills
- Septic Spills
- Sumps/Dewatering

Figure 2 provides a map showing each of the City-operated facilities covered under the SWMP.

Maintenance personnel will conduct an outfall/manhole inspection program and a site inspection program. The outfall/manhole inspection utilizes the "belowground" approach, which involves tracking dry-weather flows from the outfalls or manholes to their source. The site inspection program utilizes the "aboveground" approach, which involves conducting inspections at or near potential sources such as businesses that are known or expected to result in illicit discharges.

Measurable Goal

The following measurable goal for BMP ID-4 has been selected to ensure that illicit discharges are detected, eliminated and prevented to improve water quality:

ID-4 Identification and Elimination of Illicit Discharge Sources:

A. Inspect targeted outfalls (targeted during storm drain mapping effort) within the City on a routine basis of twice per year with follow-up inspections as appropriate to ensure abatement of violations. Below ground and above ground inspections will be conducted, with a goal to complete inspections for at least 50 percent of the City in FY 2005 and the remaining 50 percent in FY 2006. This inspection effort will continue throughout the permit term. The City will report the number and percentage of identified illicit discharges that are located at outfalls that have been inspected in order to measure the effectiveness of the inspections.

B. Respond to complaints of illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice (track response time). This response time will be adhered to, beginning FY 2005. The City will report the number and percentage of illicit discharges that are contained and remedied when the response to the problem occurred within first 24 hours of notification in order to measure the effectiveness of the response time.

ID-5 Education and Outreach: Often, illicit discharges occur because of a lack of awareness on the part of the discharger. Simply pointing out the error and suggesting best management practices to be used is usually enough to convince businesses and homeowners to cease discharging, dumping or to eliminate the illegal connection.

The most effective action in the elimination and prevention of illicit discharges is the education and cooperation of the public. Education is the primary tool of enforcement activities. The City will develop an Illegal Dumping/Illicit Connection brochure to be distributed to residents and businesses when either illegal dumping or illicit connections are discovered as part of BMPs ID-2 and ID-4. Potential pollutants to be addressed in the brochure include fertilizers and pesticide, sediment/siltation and used motor oil. The City will reassess the pollutants based on the type of illegal dumping and illicit connections identified through BMPs ID-2 and ID-4.

Measurable Goal

The following measurable goal for BMP ID-5 has been selected to ensure that illicit discharges are detected, eliminated and prevented to improve water quality:

ID-5 Education and Outreach: The City will develop an Illegal Dumping and Illicit Connections brochure in Year 2. As part of the implementation of BMPs ID-2 and ID-4 the City will distribute the brochure, at a minimum, to anyone cited by the

City for illegal dumping or an illicit connection. The City will report the number and percentage of those cited that are repeat offenders (and who previously received a brochure) in order to measure the effectiveness of the brochure.

ID-6 Illicit Discharge Ordinance: The City will implement an additional ordinance to their Municipal Code to specifically address non-storm water discharges. The City will also consider the scope of existing ordinances, the possibility of applying revisions/improvements relative to illicit discharges to the city grading ordinance and the level of success of addressing illicit discharge under existing regulations. These considerations will be included in the first annual report. The illicit discharge ordinance and revisions to existing ordinances will give the City legal authority to enforce the BMPs within the SWMP and therefore improve water quality to the MEP.

Measurable Goal

The following measurable goal for BMP ID-6 has been selected to ensure that illicit discharges are detected, eliminated and prevented to improve water quality:

ID-6 Illicit Discharge Ordinance: The new ordinance will be drafted in Year 2. Existing ordinances including the grading ordinance, zoning ordinance, Ordinance Numbers 11.24.010 and 11.24.020, and the Standard Details and Specifications will be reviewed and revised as necessary to specifically address non-storm water discharges. The Standard Details and Specifications will be revised to include provisions for compliance with General Permit Attachment 4.

6.3 REPORTING

The effectiveness of the BMPs for the Minimum Requirements of detecting, eliminating, and preventing illicit discharges will be gauged by tracking and evaluating the number of:

- Public complaints or maintenance personnel actions using the new forms/format
- Comments/suggestions received on the new ID Reporting/Complaint forms at the end of each program year
- Forms completed and submitted to the City and type of illegal dumping reporting
- Brochures that are printed and delivered to target groups and cited individuals
- Illegal connections and discharges that are identified

- Illicit connections or discharge incidents the City responds to
- Incidents when a storm drain map assists in identifying/locating an illicit discharge
- City response efforts to reported illicit discharges that occur within 24 hours
- City storm drains mapped by GIS
- Identified illicit discharges that are located at city-inspected outfalls
- Illicit discharges that are contained and remedied when response to problem occurred within first 24 hours
- Those cited who are repeat offenders

The progress in implementing the illicit discharge detection/elimination control measure will be documented in annual reports.

Measurable goals may be adjusted, if necessary. Any proposed changes to the SWMP will be presented to the RWQCB, along with justification for the change. The Board will need to approve any changes before they are implemented.

Illicit Discharge Detection/Elimination
Table 6-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
ID-1	Enforcement Authorities	Develop forms or a system for reporting public complaints or maintenance personnel actions regarding illicit discharges. These forms will identify the portion of the storm drain system impacted and any impacted water bodies and include a section for comments on how the form could be improved.	Year 1	Ongoing	Whether or not forms or another means for reporting illicit discharge complaints and maintenance personnel actions was developed	# of comments/suggestions at the end of each program year. # of public complaints or maintenance personnel actions using new forms/system % of complaints/personnel actions resulting in detection and elimination of illicit discharge
		Revise "Engineering Standard Details and Specifications" to address the Design Standards included within Attachment 4 of the General Permit, (addressed in more detail in BMPs CS-1, PC-1, PC-2, PC-3, and PC-4).	Year 2	1x	Assess whether or not updated to include design standards	
ID-2	Hazardous Materials and Waste Management	Develop forms or a system for reporting "incidents" involving hazardous waste, liquid waste, spills, etc. that could pollute storm water. Distribute the forms to the Paso Robles Department of Emergency Services, the Fire Department, the Integrated Waste Management Board, and Paso Robles Waste Disposal.	Year 2	1x	Whether or not hazardous waste "incident report" forms were developed and distributed to listed City departments, and # and types of forms developed	# of incidents reported using hazardous waste forms % of reports resulting in cleanup of hazardous waste spills

Illicit Discharge Detection/Elimination
Table 6-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
ID-3	Storm Drain Mapping	The storm drain mapping effort will begin in Year 1 and will be completed in Year 4. As new development occurs, the City will update the storm drain mapping.	Year 1	Ongoing through Year 4	Review/assess mapping progress at the end of each program year.	Make a note on the "Complaint/Action" form (ID-1) when a storm drain map assists in identifying/locating an illicit discharge.
		Identify target outfalls			Whether or not target outfalls were identified	
ID-4	Identification and Elimination of Illicit Discharges	Inspect targeted outfalls within the City on a routine basis of twice per year with follow-up inspections as appropriate to ensure abatement of violations. Belowground and aboveground inspections will be conducted.	Year 2	2x/year (Ongoing)	% of targeted outfalls inspected twice annually	# and % of identified illicit discharges that are located at inspected outfalls
		Complete inspections for at least 50 percent of the City in Year 2 and the remaining 50 percent in Year 3. This inspection effort will continue throughout the permit term.	Year 2	Ongoing	% of City outfalls inspected each year	
		Respond to complaints of illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice. This response time will be adhered to, beginning in Year 2.	Year 2	Ongoing	# and % of cases in which response time is less than or equal to 24-hours	# and % of illicit discharges that are contained and remedied when response to problem occurred within first 24 hours
ID-5	Education and Outreach	Develop an Illegal Dumping and Illicit Connections brochure. As part of the implementation of BMPs ID-2 and ID-4 the City will distribute the brochure, at a minimum, to anyone cited by the	Year 2	Ongoing	Whether or not 'Illegal Dumping and Illicit Connections' brochure is developed	# and % of those cited who are repeat offenders and who previously received a brochure

Illicit Discharge Detection/Elimination
Table 6-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
		City for illegal dumping or an illicit connection.			% of citations that include a brochure	
ID-6	Illicit Discharge Ordinance	Draft a new ordinance. Existing ordinances will be reviewed and revised as necessary to specifically address non-storm water discharges. The Standard Details and Specifications will be revised to include provisions for compliance with General Permit Attachment 4.	Year 3	1x	Assess whether or not the new ordinance has been drafted and the existing ordinances reviewed/revised by Year 3	

The purpose of construction site runoff controls is to prevent soil and construction waste from entering storm water. Sediment is usually the main pollutant of concern; during a short period of time, construction sites can contribute more sediment to creeks than can be deposited naturally over several decades. The resulting siltation and the contribution of other pollutants from construction sites can cause physical, biological, and chemical harm to local waterways. The BMPs prescribed in the Construction Site Storm Water Control Section of the SWMP specifically address the sediment and siltation pollutants of concern. However, as a result of implementing these BMPs, other pollutants (diesel, used motor oil, concrete wash, etc.) will also be reduced.

7.1 MINIMUM REQUIREMENTS

The General Permit requires the following to meet the minimum requirements:

> The Permittee must develop, implement, and enforce a program to ensure controls are in place that will prevent or minimize water quality impacts from storm water runoff from construction sites. Within the permit area, the program must apply to all construction projects that disturb greater than or equal to one acre (including projects less than one acre that are part of a larger plan of development or sale that would disturb more than one acre) and that discharge into the Permittee's small MS4.

In addition, EPA guidelines establish the following BMPs for Construction Site Runoff Control Minimum Requirement:

- Ordinance or other regulatory mechanism as well as sanctions to ensure compliance
- Requirements for construction site operators to implement appropriate erosion and sediment control BMPs
- Requirements for construction site operators to control waste
- Procedures for site plan review which incorporate consideration of potential water quality impacts
- Procedures for receipt and consideration of information submitted by the public
- Procedures for site inspection and enforcement of control measures

7.2 BMPs

The following BMPs are either existing or will be implemented by the City over the next five years, upon approval of this SWMP, to satisfy the Minimum Requirement of the Construction Site Storm Water control measure and improve water quality to the MEP. The BMPs below are numbered as CS (Construction Site) BMPs. The Construction Site Storm Water Control BMPs are summarized in Table 7-1.

7.2.1 Existing BMPs

The City currently adheres to three main programs that apply to construction projects and help to prevent/minimize water quality impacts from storm water runoff. These three existing programs are:

- Grading Ordinance (Title 20)
- Building and Construction Ordinance (Title 17)
- Construction Guidelines of the City's Standard Details and Specifications

Furthermore, the City Engineer is designated to receive calls from the public regarding concerns about construction activities.

7.2.2 Additional Future BMPs

CS-1 Revise Grading Ordinance: State planning law authorizes the City's Community Development to evaluate new development (and redevelopment) projects; therefore Planning and Development (P&D) has a key role in implementing the NPDES Phase II construction runoff control measures. The City's Grading Ordinance, which addresses construction site runoff control and associated inspection and enforcement procedures, provides the necessary framework for implementing construction runoff control measures.

P&D Department staff will revise the grading ordinance to comply with NPDES Phase II regulations by specifying requirements for construction-related disturbance of one or more acres and enhancing grading permit plan check and site inspection practices. Because the City is considered a high growth area, Community Development will incorporate Attachment 4 of the General Permit into the grading ordinance and grading permit process. These revisions will create an enforcement tool for reducing sediment and siltation from construction sites to the MEP.

In summary, the revisions to the Grading Ordinance will include:

- Language linking the ordinance to the General Permit

- New definitions to clarify NPDES related terms used in the ordinance

- Required preparation and implementation of erosion and sediment control and storm water BMPs for all grading operations that require a grading permit (many projects are already required to implement erosion and sediment control measures to some extent)

- Prohibitions on non-storm water construction related discharges (e.g. concrete truck washout, proper disposal of discarded building materials, construction vehicle leaks and maintenance, etc.)

- Submittal of copies of Notice of Intent and Storm Water Pollution Prevention Plan (SWPPP) for sites of one or more acres of land disturbance in accordance with the small construction program

- Enhanced site inspection procedures to include inspection of construction storm water BMPs and appropriate design standards

- Specific guidance to use approved BMP manuals

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the MEP. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

CS-1 Revise Grading Ordinance:

A. Beginning in Year 3, record the annual number and percent of projects (within the permit area) permitted and constructed under a Grading Permit, ranked by size of overall project (between 1 and 5 acres, and greater than 5 acres). Achieve 100 percent compliance with revised grading ordinance language and with local SWRCB's construction site runoff control program (SWPPPs) and achieve full compliance with enhanced site inspection procedures. City staff will report the number and percent of inspections resulting in an enforcement action, and the number and percent of repeat offenders.

B. Revise the grading ordinance in Year 3 to include specific requirements for certain types of development including:

- single-family hillside development
- 100,000 square foot commercial developments
- automotive repair shops
- retail gasoline outlets
- restaurants
- residential subdivisions with 10 or more housing units
- parking lots of 5,000 square feet or more or with 25 or more parking spaces

The specific requirements will meet the General Permits Attachment 4 requirements and will coincide with the revision of the City's Construction Standard Details and Specifications.

CS-2 Adoption of Existing BMP Manuals: One of the major revisions to the Grading Ordinance will be reference to effective BMP manuals. The manuals will assist applicants in applying appropriate and sufficient BMPs, including construction related sediment and siltation runoff:

- Storm Water Quality Task Force (1993 or current) Construction Activity Best Management Practice Guidebook

- Caltrans (2002 or current) Construction Site Best Management Practices Handbook

- San Francisco Regional Water Quality Control Board (1999 or current) Erosion and Sediment Control Field Manual

These particular manuals will be available for review and offer a wide range of choices to the applicant for selection and implementation of BMPs. The wide range of choices provides measures that can be applied appropriately for each unique project. They include very detailed and specific BMPs for large or complex projects to simple and straightforward BMPs for small or low impact projects. Final decision on the appropriateness and effective use of the BMPs will be made by staff through approval of the Sediment and Erosion Control Plan, submitted as part of the Grading Permit.

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the MEP. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

CS-2 Adoption of Existing BMP Manuals: Beginning in Year 2, record annual number of sites where the City has implemented enforcement action, including letters to correct, stop work orders, bonds used, etc. where BMPs have not been implemented properly. The City will report the number and percent of total sites where BMPs are not being implemented properly, as well as the number and percent of increase or decrease (annually) in City enforcement actions due to improper BMP implementation or maintenance.

CS-3 Prepare Construction Community Outreach/Information Materials: The City will provide materials to the development/construction community to consider when they are planning their project or filing for permits. These informational materials will focus on the following five guiding principles:

- Use of good site planning
- Minimization of soil movement
- Capture of sediment to the MEP
- Good housekeeping practices
- Minimization of impacts of post construction storm water discharges
- Water line flushing

The informational materials should also include practical, cost-effective measures that can be incorporated into the project to reduce the potential for storm water pollution. Education of construction contractors will result in an indirect effect of reducing sediment and siltation from construction projects into receiving waters.

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the MEP. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

CS-3 Prepare Construction Community Outreach/Information Materials: Beginning in Year 2, provide City construction contractors and developers with construction BMP brochures and materials for distribution to permit applicants. The City will record the annual number of informational brochures/materials distributed to construction staff, as well as the percent of applicants receiving and/or using the brochures.

7.3 REPORTING

Feedback from City inspectors, construction contractors, project owners and the public will be evaluated and potential changes to the Grading ordinance and its implementation will be evaluated. To the extent these changes could change the level of protection to storm water quality they will be discussed in the annual report. The progress in implementing the construction site storm water control measure will be documented in annual reports.

Measurable goals may be adjusted, if necessary. Any proposed changes to the SWMP will be presented to the RWQCB, along with justification for the change. The Board will need to approve any changes before they are implemented.

Construction Site Storm Water Control
Table 7-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
CS-1	Enforcement Authorities	Record the annual number of projects permitted and constructed requiring a Grading Permit, ranked by size of overall project. Achieve 100 percent compliance with revised grading ordinance language and with local SWRCB's construction site runoff control program (SWPPPs) and achieve full compliance with enhanced site inspection procedures.	Year 3	Ongoing	# and % of projects (within the permit area) achieving 100 percent compliance	# and % of inspections resulting in enforcement action, and # and % of repeat offenders
					City's compliance with enhanced site inspection procedures	
		Revise the grading ordinance in Year 3 to include specific requirements for certain types of development (see CS-1 text). The specific requirements will meet the General Permits Attachment 4 requirements and will coincide with the revision of the City's Construction Standard Details and Specifications.	Year 3	1 x	Assess whether or not the ordinance has been revised to meet Attachment 4 requirements by end of Year 3	
CS-2	Adoption of Existing BMP Manuals	Beginning in Year 4, record annual number of construction sites where the City has implemented enforcement action, including letters to correct, stop work orders, bonds used, etc. where BMPs have not been implemented/maintained properly.	Year 4	Ongoing	Whether or not enforcement actions are recorded/tracked.	# and % of increase or decrease (annually) of City enforcement actions due to improper BMP implementation/maintenance
						# and % of sites where BMPs are not being implemented properly

Construction Site Storm Water Control
Table 7-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
CS-3	Construction Outreach and Information Materials	Provide all City construction staff with construction BMP brochures/materials for distribution to permit applicants.	Year 2	Ongoing	Whether or not City construction staff has construction BMP brochures/materials for distribution to applicants	# of brochures and informational materials distributed annually, and % of applicants receiving/using brochures

One of the best opportunities to reduce the generation of non-point source pollution from urban runoff is through planning and design, before developments are built. Once built, problems are complex and expensive to correct. This minimum control measure focuses on site and design considerations, which are most effective when addressed in the planning and design stages of project development. Effective long-term management and maintenance are critical, so the best design opportunities are those with the minimum of maintenance needs. The goal of the program is to integrate basic and practical storm water management techniques into new development to protect water quality.

The City has experienced growth of more than 25 percent in recent years and therefore is defined by the RWQCB as a "high growth area." As a high growth area, the City must incorporate Attachment 4 of the General Permit into the SWMP. Attachment 4 includes receiving water limitations and design standards. Implementation of the provisions in Attachment 4 will have the direct result of decreasing the impacts from new construction within the City on receiving waters.

8.1 MINIMUM REQUIREMENTS

The General Permit requires the following to meet the Minimum Requirements:

- Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disrupt greater than or equal to one acre

- Develop and implement strategies which include a combination of structural and/or non-structural BMPs

- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment to the extent allowable under local law

- Ensure adequate long-term operation and maintenance of BMPs

- Areas of high growth must comply with Attachment 4, which include receiving water limitations and design standards

8.2 BMPs

The following BMPs are either existing or will be implemented by the City within the next five years, upon approval of this SWMP, to satisfy the Minimum Requirements of the Post Construction Storm Water Management control measure. The BMPs below are numbered as PC (Post Construction) BMPs. The Post Construction Storm Water Management BMPs are summarized in Table 8-1.

8.2.1 Existing BMPs

PC-1 Land Use Policies in the General Plan: The City land use policies include a number of measures that protect storm water quality. They include:

- Policy OA-6 defines the City's program to update the Master Plans for water, sewer, and storm drains to be consistent with the resource management plan and development phase lines.

- Policy OA-7 defines the City's environmental impact mitigation in regards to new development. Mitigation calls for properties that benefit from certain services such as storm drain maintenance and other services to contribute their fair share of the costs of operating and maintaining them.

- Policy OA-9 states that development will be required to meet the highest quality standards in terms of design, construction and aesthetic quality and encourages the preservation of natural resources, including the Salinas River and other major drainages.

- Policy OA-10 states that areas for Specific Plans should be large enough to include unique physical characteristics, such as major drainage courses that could best be preserved via methods such as common open space areas financed via development impact fees.

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

PC-1 Land Use Policies in the General Plan:

A. Beginning in Year 1, inspect all completed projects for implementation of structural runoff controls as required in the revised design standards, and inspect all structural controls annually to ensure that maintenance is performed. These inspections, performed by City maintenance staff, will facilitate assessing implementation and adherence to the existing land use policies that protect storm

water quality. City staff will report the number and percent of completed projects inspected annually, and the percentage of projects implementing structural runoff controls in accordance with design standards.

B. Beginning in Year 1, requirements in the General Plan will be updated to include design standards (as identified in Attachment 4 of the General Permit) for the following types of discretionary development projects: single-family hillside development; 100,000 square foot commercial developments; automotive repair shops; retail gasoline outlets; restaurants; residential subdivisions with 10 or more housing units; and parking lots of 5,000 square feet or more or with 25 or more parking spaces.

8.2.2 Additional Future BMPs

PC-2 City Policy and Process Revisions: In general, the City's existing land use policies and development review process provide a strong framework for water quality protection and compliance. To comply with NPDES Phase II objectives, the City must ensure consistent interpretation and application of policies, adequate implementation tools, and consistent and adequate implementation and enforcement of mitigation measures. To provide this, City staff recommends the following:

- Interpretive guidelines for key Comprehensive Plan policies addressing water quality
- Revised CEQA initial study checklist that lists storm water pollution as an issue area on new development and redevelopment
- New qualitative CEQA thresholds to provide the basis for identifying storm water quality impacts and determining whether impacts are significant
- New conditions of approval and mitigation measures to implement key policies and address identified CEQA impacts

In addition, the Public Works Department will develop:

- Rules for designing structural BMPs to provide water quality protection on new development and redevelopment as a part of their Standard Conditions of Approval

- Specific BMPs to be included in the City's Engineering Details and Specifications that improve upon existing practices discussed in the guidelines for design, materials, and construction

- Revisions to the City's Engineering Details and Specifications as required by General Permit Attachment 4 to include applicable provisions for new development to regulate peak storm water runoff discharges; conserve natural areas; minimize pollutants of concern; protect slopes and channels; provide storm drain stenciling; properly design outdoor storage areas; properly design trash storage areas; provide proof of ongoing BMP maintenance; design standards for structural/treatment control BMPs; and specific provisions for specific types of priority projects. Priority project include: 100,000 square foot commercial developments; restaurants; retail gasoline outlets; automotive repair shops; and parking lots.

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

PC-2 City Policy and Process Revisions:

A. Beginning in Year 2, evaluate all City funded projects for construction and implementation of water quality control measures (Public Works) through the term of the permit. The City will report the number and percentage of projects evaluated, as well as the number and percentage with adequate BMPs.

B. Beginning in Year 2, evaluate all City funded projects on a yearly basis for proper functioning and maintenance of water quality measures (Public Works) through the term of the permit. The City will report the number and percentage of projects evaluated, as well as the number and percentage with adequate BMP operation and maintenance.

C. Beginning in Year 2, track number of enforcement actions taken on conditioned projects, such as correction notice, stop work order, and collection of any bonds, and time frame for developer to take corrective steps to resume work through the term of the permit. The City will assess whether or not enforcement actions are

tracked, and the number of enforcement actions. The number and percentage of repeat offenders will also be reported.

D. Beginning in Year 3, revise the Construction Guidelines of the City's Standard Details and Specifications to include the provisions in Attachment 4 of the General Permit.

PC-3 Development Requirements: New development/redevelopment urban runoff issues can be addressed at the City level or at the individual project level. To help to implement the post-construction, new development/redevelopment storm water management program, the City also proposes to adopt a new land use policy specific to storm water management through a General Plan amendment and/or an ordinance. This new City policy and/or ordinance will require a new development or a redevelopment project to do one or all of the following:

- Minimize impervious area
- Install treatment controls, as appropriate to the site
- Participate in the funding of regional/municipality-level BMPs in accordance with a regional/municipality level plan

In addition, the new City policy and/or ordinance will incorporate all elements of the design standards and receiving water limitations that are not addressed in either the General Plan, grading ordinance or Standard Details and Specification revisions. This new policy and/or ordinance will meet the requirements of Attachment 4 of the General Permit and have a direct effect of reducing pollutants of concern in receiving waters.

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

PC-3 Development Requirements:

A. Prepare a new policy and/or ordinance in Year 2 to include the provisions of General Permit Attachment 4 not already addressed in other revisions to City policies and ordinances. The City will assess whether or not the policy/ordinance has been prepared by Year 3, and will review it to ensure compliance with Attachment 4 requirements.

B. Establish tracking program of innovative projects designed to protect/improve water quality. Tracking program would include information on project owner/project designer/project building, copies of as-built plans, goals of project, photo documentation during construction and post-development, and over a period of three years additional photo documentation of facility in operation (i.e., storm flows during rain events, establishment of vegetation, public use if appropriate, etc.). Beginning in Year 2, at least three projects will be tracked over a period of three years and the project files kept available to the public as examples of good site design. The City will review the program to ensure it is tracking and made available to the public. The number of people (public) who review the innovative project files will also be reported.

PC-4 Permitting Process: The permitting process provides the City the opportunity to review a new development or redevelopment project during its planning stage and to direct its design and development in regards to urban runoff issues. The City will make the following revisions to the approval process to protect storm water quality:

- If there is a pre-application meeting, the City's permitting staff should inform the applicant of the City's General Plan Policies and/or ordinance requirements regarding storm water, and provide guidance on potential design measures and post construction controls available for the type of project proposed.

- Once the application is received, the staff should review the application for storm water runoff issues. The staff should use a revised CEQA checklist to examine the project's potential to affect storm water quantity and quality.

- If impacts are considered likely and the applicant has included post construction controls in the development plan, the staff should review them for appropriateness and adequacy.

Measurable Goal

Measurable goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward the construction program:

PC-4 Permitting Process: Beginning in Year 2, track the number of permit applications that are returned or rejected due to insufficient assessment of the project's impacts on storm water quantity and quality or due to inadequate inclusion of post construction controls for storm water. The City will report the number and percentage of permit applications that are returned or rejected.

8.3 REPORTING

Data collected for each measurable goal will be compiled and reviewed. Significant variance from targets will be assessed and discussed in annual reports to RWQCB. Feedback from City staff, permittees, developers, stakeholders, etc. will be used to modify BMPs or the measurable goals, as appropriate; the basis for any changes will be included in the following annual report. The progress in implementing the post construction storm water management control measure will be documented in annual reports.

Measurable goals may be adjusted, if necessary. Any proposed changes to the SWMP will be presented to the RWQCB, along with justification for the change. The Board will need to approve any changes before they are implemented.

Post Construction Storm Water Management
Table 8-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
PC-1	Land Use Policies in General Plan	Inspect all completed projects for implementation of structural runoff controls as required in the revised design standards, and inspect all structural controls annually to ensure that maintenance is performed	Year 1	Ongoing	# and % completed projects inspected	% of projects implementing structural runoff controls in accordance with design standards
		Update General Plan requirements to include Attachment 4 design standards	Year 1	1x	Assess whether or not updated to include design standards	
PC-2	City Policy and Process Revisions	Evaluate all City-funded projects for construction and implementation of BMPs	Year 2	Ongoing	# and % evaluated	# and % with adequately constructed and implemented BMPs
		Evaluate all City-funded projects for proper functioning and maintenance of BMPs	Year 2	Annually	# and % evaluated	# and % with adequate BMP operation and maintenance
		Track number of enforcement actions taken on conditioned projects and time frame for developer to take corrective steps to resume work	Year 2	Ongoing	Assess whether or not tracked, and # of enforcement actions	# and % repeat offenders
		Revise the Construction Guidelines of the City's Standard Details and Specifications to include the provisions in Attachment 4	Year 3	1x	Assess whether or not revised	

Post Construction Storm Water Management
Table 8-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
PC-3	Development Requirements	Prepare a new policy and/or ordinance to include the provisions of General Permit Attachment 4 not already addressed in other revisions to City policies and ordinances	Year 2	1x	Assess whether or not prepared by Year 3	Assess whether or not City is in full compliance with Attachment 4 requirements
		Track at least 3 innovative projects that protect/improve water quality	Year 2	Ongoing	Assess whether or not tracked and made available to public	# of people (public) that review the example projects
PC-4	Permitting Process	Track the number of permit applications that are returned or rejected	Year 2	Ongoing	Assess whether or not tracked	# and % of permit applications returned/rejected

The purpose of this minimum control measure for Municipal Operations/Good Housekeeping Practices is to assure that the City's delivery of public services occurs in a manner protective of water quality and does not increase pollutants of concern entering receiving waters from City services. In this way the City will serve as a model to the community.

9.1 MINIMUM REQUIREMENTS

The General Permit states that the Permittee must develop and implement an operations and maintenance plan that will prevent or reduce pollutants in runoff from municipal operations. The Minimum Requirements are:

- To consider municipal activities and identify those that may contribute pollutants to storm water
- To select and implement BMPs that will reduce or eliminate pollutants in storm water runoff from these activities to the MEP
- To train new and existing employees on the potential impacts to storm water from municipal activities and the implementation of BMPs to prevent and reduce these impacts

To address these requirements, the City's SWMP must include programs that focus on municipal operations.

9.2 BMPs

The following BMPs are either existing or will be implemented by the City within the next five years, upon approval of this SWMP, to satisfy the Minimum Requirements of the Pollution Prevention/Good Housekeeping control measure and will either have a direct or indirect effect on water quality. The BMPs below are numbered as GH (Good Housekeeping) BMPs. The Pollution Prevention/Good housekeeping BMPs are summarized in Table 9-1.

9.2.1 Existing BMPs

GH-1 Facility Maintenance: The City manages several facilities. Typically, the City hires a private contractor to conduct landscape maintenance (including watering, trimming, lighting, etc.) for the city-owned facilities. These facilities found throughout the City (see Figure 2) include:

- Airport Facilities
- Parks/Recreational Fields
- City Hall/Library
- Municipal Pool
- North County Transportation Center
- Public Safety Center
- Senior Center
- Stephan's Center (after school programming)
- Veteran's Center
- City Streets
- City Parkways/Medians/Planters
- City Maintenance Buildings

The City coordinates with a local landscape construction company to conduct designated watering schedules for the City's landscaping. As would be expected, heavier watering occurs from May through August, and about half the watering takes place from February through May. During September through February, watering is only conducted on an "as needed" basis, depending on the amount of rain, but always more than once a week. This has the direct effect of decreasing the amount of non-storm water runoff flowing to receiving waters and carrying with it pollutants of concern.

The City also adheres to technical specifications for landscape maintenance. The specifications provide a level of maintenance that the contractor(s) must adhere to and include:

- Litter control
- Walkways and medians
- Irrigation
- Pest control
- Turf maintenance
- Ground cover maintenance
- Shrub and shrub bed maintenance
- Tree maintenance
- Weed control
- Restroom maintenance
- Drinking fountains
- Open space
- Creeks
- Detention basins

These specifications also have the direct effect of decreasing pollutants (potable water use, litter, vegetation, pesticides, herbicides and fertilizer) from entering receiving waters.

Measurable Goal

The pollution prevention and good housekeeping BMPs are paired with measurable goals to ensure the specific BMPs are implemented and their success for the SWMP are measured. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward BMP GH-1:

GH-1 Facility Maintenance: Beginning in Year 2, randomly conduct inspections, twice yearly, to verify contractor adherence to City technical specifications for landscape maintenance, street sweeping, litter control, etc. Develop a form/format to report the inspections and include them in the annual report (see Section 6.4). The City will track the number of inspections conducted, as well as the number and percentage of inspections that result in a corrective action.

GH-2 Integrated Waste Management Association: San Luis Obispo County's Integrated Waste Management Association (IWMA) displays pollution prevention/good housekeeping tips on their IWMA website regarding the proper disposal of household hazardous waste. It is publicized on the website that hazardous waste should not be disposed of in the trash or in the gutter. IWMA makes it clear that disposal of hazardous waste is regulated and improper disposal is illegal and the penalties can be substantial. Hazardous waste must be disposed of on a designated drop off day at a designated location, which, for the City, is the Corporation Yard at 625 Riverside Drive. The maximum amount allowed for drop off at one time is 15 gallons or 125 pounds.

The City also encourages the recycling of used motor oil, which is a common potential storm water pollutant. The City has two certified used oil recycling centers, located at the two Kragen Auto Parts retail stores in Paso Robles.

These existing control measures have a direct effect of reducing pollutants (hazardous materials) from entering receiving waters.

Measurable Goal

The pollution prevention and good housekeeping BMPs are paired with measurable goals to ensure the specific BMPs are implemented and their success for the SWMP are measured. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward BMP GH-2:

GH-2 Integrated Waste Management Association: By Year 3, increase the awareness about waste management by including IWMA's website in City brochures

and fact sheets and in training programs for City employees (see GH-5). Brochure distribution will be tracked under other control measures.

9.2.2 Additional Future BMPs

GH-3 Facility Surveys: The City operates many different kinds of facilities over a varied area. In order to address the need for storm water protection, a four-step process is recommended to survey the nature of each operation, identify appropriate BMPs and provide for their implementation. Each facility will be evaluated with respect to operations, activities and existing storm water management practices. This evaluation will also identify potential pollutants for each facility and determine if existing practices need to be revised to eliminate impacts to receiving waters.

A comprehensive list of all City facilities has been developed. Since no one department maintains such a list, several departments were contacted for their database of facilities. (The departments and facilities will be asked to indicate any location changes in their annual report).

A questionnaire will be developed to ensure appropriate, detailed and standardized information. In addition, the questionnaire will cover current pollution prevention BMPs, permits and inspections, record keeping and reporting methods. Some City facilities are subject to the General Industrial Storm Water Permit, including the Paso Robles Landfill, Municipal Airport, California Youth Authority, and Mid-State Fairgrounds, and as such are not included in the program.

A hierarchy will be developed for conducting the surveys based on the requirements of Phase I Permits, known operations, and other factors such as hazardous waste permits. During the facility surveys, potential water quality impacts will be noted based on activities, materials used, wastes generated, standard operating procedures (SOPs), and storage practices.

Supervisors or managers who oversee the field operations will provide detail on activities conducted off-site that could have potential impacts to storm water. Recommendations for field activity BMPs will be developed.

Undeveloped city-owned or leased sites will not be part of the survey program because they have little implication for storm water quality.

Measurable Goal

The pollution prevention and good housekeeping BMPs are paired with measurable goals to ensure the specific BMPs are implemented and their success for the SWMP are measured. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward BMP GH-3:

GH-3 Facility Surveys: By Year 3, the results of the facility surveys will be compiled in a spreadsheet, which identifies each facility or field operations (by department and division) with their potential to impact storm water. The matrix will identify activities and the associated BMPs for each department and facility and will be annually updated by the appropriate department. It will also identify any existing practices that were changed as a result of the survey. This information will be presented in the annual reports to the RWQCB. In Year 5, the City will assess whether the practices that were changed as a result of the survey are still in place, and if so, if it seems they benefit storm water quality.

GH-4 Development of BMPs Fact Sheets: BMP Fact Sheets will be developed for all City activities based upon the facility surveys as discussed in GH-3. Municipal activity fact sheets have already been developed by/for other agencies. The City will modify these existing fact sheets to apply to the facility activities specific to its operations. Fact Sheets will be grouped by activity, such as Housekeeping and Vehicle Repair. Each BMP Fact Sheet will list a variety of specific BMPs that can be selected by a facility manager as appropriate for the particular site and activity. Not all of the BMPs listed on a Fact Sheet will be employed; those that are appropriate would be determined on a site-by-site basis. Because many of the facilities already conduct operations in a manner to control pollutants, this menu approach allows site managers to take credit for their existing efforts and select new options to augment their existing program.

The Fact Sheets will focus mainly on “source control” since this approach usually provides the best protection for water quality at the least cost and inconvenience. To keep current with changes, each facility will be requested to suggest improvements that will help not only their operations, but make improvements at other locations throughout the City.

Measurable Goal

The pollution prevention and good housekeeping BMPs are paired with measurable goals to ensure the specific BMPs are implemented and their success for the SWMP are measured. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward BMP GH-4:

GH-4 Development of BMPs Fact Sheets: By Year 2, one fact sheet will address treatment control, or structural control, BMPs. Although source control would be considered first priority, in some instances treatment control may also be appropriate and cost-effective. The Treatment Control BMP Fact Sheet references several handbooks, which contain detailed information on treatment controls. These handbooks have been chosen for their acknowledged experience in managing storm water runoff quality under the wide variety of conditions found in California. Over the next five years (2004-2009), depending on the conditions in the City, some treatment BMPs will be created to address special local situations.

The handbooks will include:

- California Department of Transportation. Storm Water Quality Handbook: Construction Site Best management Practices (BMPs) Manual. November 2000.
- California Regional Water Quality Board San Francisco Bay Region. *Erosion and Sediment Control Field Manual.* Third Edition, July 1999.
- California Storm Water Quality Task Force. California Storm Water Best Management Practices Handbooks: Construction Activity; Industrial/Commercial Activity; and Municipal Activity. Three volumes, March 1993.

City staff will assess the number and percentage of the targeted City facilities (GH-3) that are implementing the local treatment BMPs annually after Year 2.

GH-5 Employee Training by City Departments: City employees will receive an appropriate level of training on storm water pollution prevention based on their work responsibilities. Much of the training programs will be integrated into existing training presented to staff, such as safety training. A program will be developed Citywide for distributing BMP Fact Sheet "City-Wide Employee BMPs." This Fact Sheet will provide general direction to all City employees through new employee orientation to protect water quality both at work and at home.

Measurable Goal

The pollution prevention and good housekeeping BMPs are paired with measurable goals to ensure the specific BMPs are implemented and their success for the SWMP are measured. The intent is to provide an opportunity to assess and evaluate the program and provide feedback mechanisms to measure and update the program as appropriate.

The following measurable goal will be applied toward BMP GH-5:

GH-5 Employee Training by City Departments: Implementation of the City's training effort will be tracked annually by:

- Number of training sessions presented
- Number and % of staff trained, by Department
- Number of email reminders to City staff to protect water quality

Beginning in Year 3, storm water training will occur either quarterly or annually, depending on personnel involved. In addition, managers will be given specific guidance on their departmental and contractual responsibilities for storm water management, while facilities with SWPPPs will have very specific training requirements as directed by the Plan. Frequency and type of training will depend on the activities targeted. The City will measure the effectiveness of the training by issuing a survey or exam before and after the training modules and comparing the results.

9.3 REPORTING

Data collected for each measurable goal will be compiled and reviewed. City employees, stakeholders, etc. will be used to modify BMPs or the measurable goals, as appropriate; the basis for any changes will be included in the following annual report. The progress in implementing the pollution prevention/good housekeeping control measure will be documented in annual reports.

Measurable goals may be adjusted, if necessary. Any proposed changes to the SWMP will be presented to the RWQCB, along with justification for the change. The Board will need to approve any changes before they are implemented.

Pollution Prevention/Good Housekeeping
Table 9-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
GH-1	Facility Maintenance	Randomly conduct inspections, twice yearly, to verify contractor adherence to City technical specifications for landscape maintenance, street sweeping, litter control, etc.	Year 2	2x/year	# of inspections conducted	# and % of inspections that result in corrective actions
		Develop a form/system to report the inspections and include them in the annual report.	Year 2	1x	Assess whether form/system is developed	
GH-2	Integrated Waste Management Association	Increase the awareness about waste management by including IWMA's website in City brochures and fact sheets and in training programs for City employees.	Year 3	1x	Assess whether IWMA's website has been included on brochures/fact sheets	
GH-3	Facility Surveys	Compile results of facility surveys in a spreadsheet. The matrix will identify activities and the associated BMPs for each department and facility and will be annually updated by the appropriate department. It will also identify any existing practices that were changed as a result of the survey.	Year 3	Annually	Whether or not survey results compiled	In Year 5, assess whether changed practices are still in place and benefit storm water quality
					# of practices changed as a result of the survey	

Pollution Prevention/Good Housekeeping
Table 9-1

#	BMP	Measurable Goal	Start Date	Frequency	Progress Measurements	Effectiveness Measurements
GH-4	Development of BMP Fact Sheets	By Year 2, one fact sheet will be developed to address treatment control, or structural control, BMPs.	Year 2	Ongoing	# of treatment BMP fact sheets developed to address local situations	# and % of targeted City facilities (see GH-3) implementing the treatment BMPs
GH-5	Employee Training by City Depts.	Beginning in Year 3, storm water training will occur either quarterly or annually, depending on personnel involved. In addition, managers will be given specific guidance on their departmental and contractual responsibilities for storm water management, while facilities with SWPPPs will have very specific training requirements as directed by the Plan.	Year 3	Ongoing	# of training sessions, # and % of staff trained (by dept.), and # of email reminders to City staff to protect water quality	Comparison of employee storm water survey/exam results before and after training each year

10.1 MONITORING AND REPORTING REQUIREMENTS

The purpose of monitoring and reporting is to document successful implementation and overall effectiveness of the SWMP. The Phase II General Permit requires annual reports to be submitted starting in August 2004. The City intends these annual reports to cover the fiscal year immediately prior to the reporting period.

The City will monitor the implementation of its program (existing and new BMPs) and the overall effectiveness by measuring and reporting the data discussed in the individual Minimum Control Measures sections discussed in Section 4.0 through 9.0.

Generally, four types of data will be collected:

- Progress establishing BMPs that are developed during the SWMP implementation period, or establishing existing BMPs in newly identified management areas
- Training the staff (and as appropriate contractors) who work for the City
- Objective measures of ongoing BMPs such as public participation or education outreach
- Response time and results of pollution cleanup

The City will regularly evaluate both current conditions and BMP effectiveness, and as appropriate update BMPs and measurable goals to achieve the objective of meeting water quality standards to the Maximum Extent Practicable. If after implementing the minimum control measures there is still water quality impairment associated with discharges from the City's MS4, it may be necessary to expand or better tailor existing BMPs, upon approval by the RWQCB.

10.2 PUBLIC AWARENESS SURVEYS

Public awareness surveys are a good evaluation tool to assess the effectiveness of the SWMP. Because surveys can be expensive to conduct, the City will coordinate surveys with other nearby municipalities or entities to reduce costs. This survey effort will also satisfy the partnership opportunity requirement stated by the Regional Board in the Draft Phase II Permit. Survey data will be used to help justify public education and outreach budgets for subsequent years. As human awareness or behavior is unlikely to change significantly in one year, the appropriate frequency for these surveys is every two years.

10.3 REPORTING AND COMPILATION OF DATA

The City will develop a reporting system to allow organized and consistent reporting of BMPs. This City reporting program is intended to track BMP selection and implementation, identify schedules for all facilities, and provide opportunity for feedback and clarification on BMPs. Report results will be used directly in the annual report to the RWQCB to identify BMPs implemented by the City.

Pursuant to the "General Permit", the City will retain storm water records for five years. Each department responsible for implementing substantive elements of the SWMP will be instructed to keep their records for five years. These records will be the source of compiled data contained in the Annual Report.

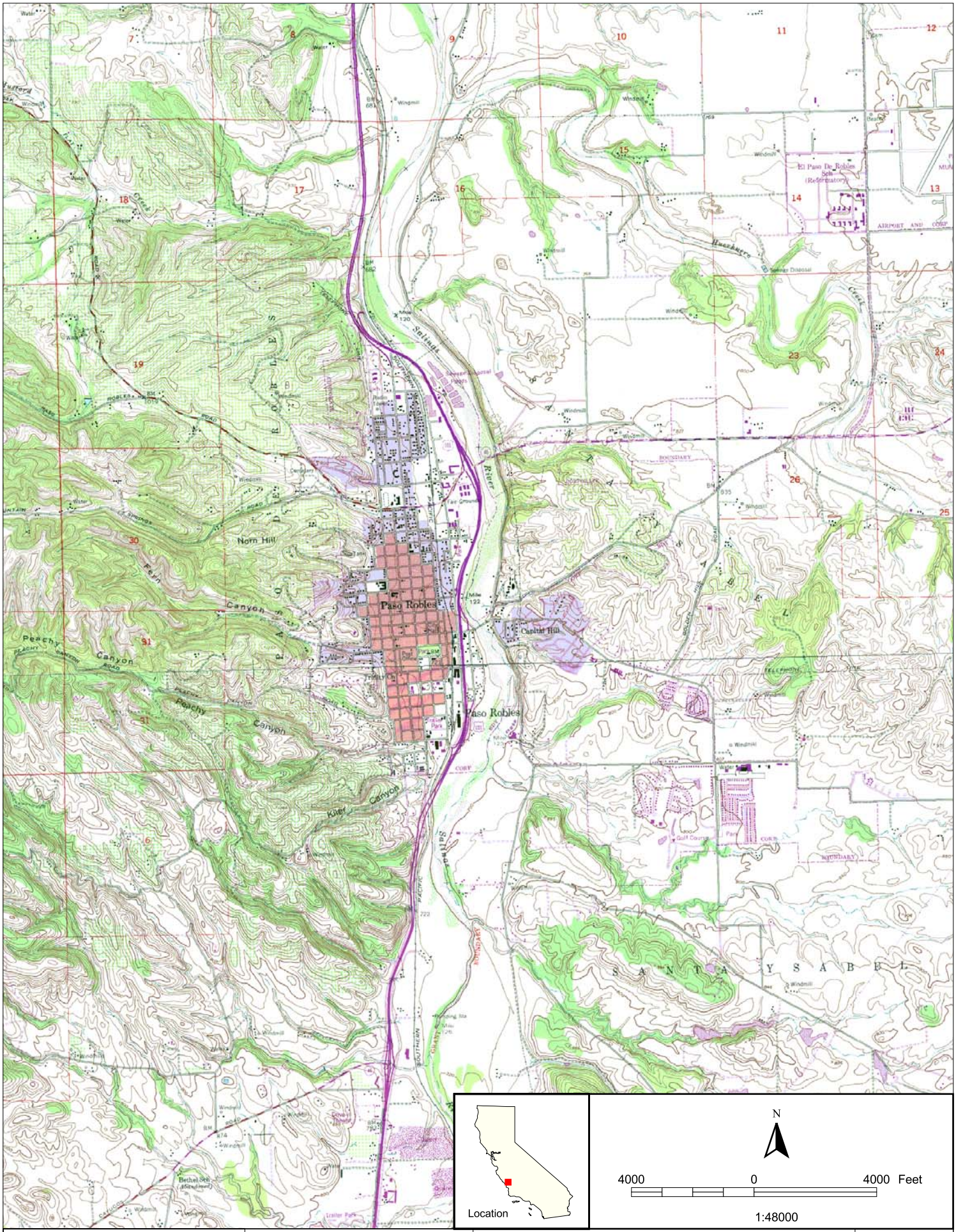
10.4 FORM AND CONTENT OF ANNUAL REPORT

The State has provided an Annual Report Guidance Document (March 5, 2004) to assist small MS4s with evaluating their storm water program and preparing a report of the status of measurable goals. The guidance document offers specific guidance on completing the suggested Annual Report Form, however the Form is not a requirement, as MS4s may choose to comply with the General Permit's annual report requirements by using their own format.

The City intends to provide summaries of data in tabular form. Data such as number of employees trained, number of educational materials distributed, number of construction sites inspected, etc. will be presented in summary tables. Because the City is required to keep records for five years and due to the intent of the reporting requirement, the annual report will focus on a summary of progress and discuss any proposed changes to the SWMP the City sees as necessary in order to meet the Maximum Extent Practicable standard. The reporting format shall be flexible and if changed, justifications will be given. The goal will be to clearly show program effectiveness and progress, to discuss program adjustments, and response to challenges in implementing the SWMP.

10.5 NONCOMPLIANCE REPORTING

If the City has any instances of noncompliance with the Phase II General Permit, the City Manager will notify the appropriate RWQCB within 30 days. The notification will identify the noncompliance event and an initial assessment of any impact caused by the event. The actions necessary to achieve compliance will be identified, and a time schedule indicating when compliance will be achieved will be included.



Paso Robles SWMP **URS Corporation** T:\Paso_Robles\deliverables\paso_robles.apr	**Source:** *7.5' topographic quadrangle:* U.S. Geological Survey Paso Robles, Templeton, CA	Figure 1. **SITE MAP**	November 2003

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Legend

Facilities

City Limits

Calif.

Site Location

0' 1,600' 3,200'

Scale
1 Inch = 3,200 Feet

Paso Robles Municipal Airport

City Waste Water Treatment Plant

Stephan Youth Center

Pool

Mandella Park

Fairgrounds

Street/Water City Yard

Barney Schwartz Park

City Hall

Public Safety Center

City Maintenance Building

North Co. Transit Center

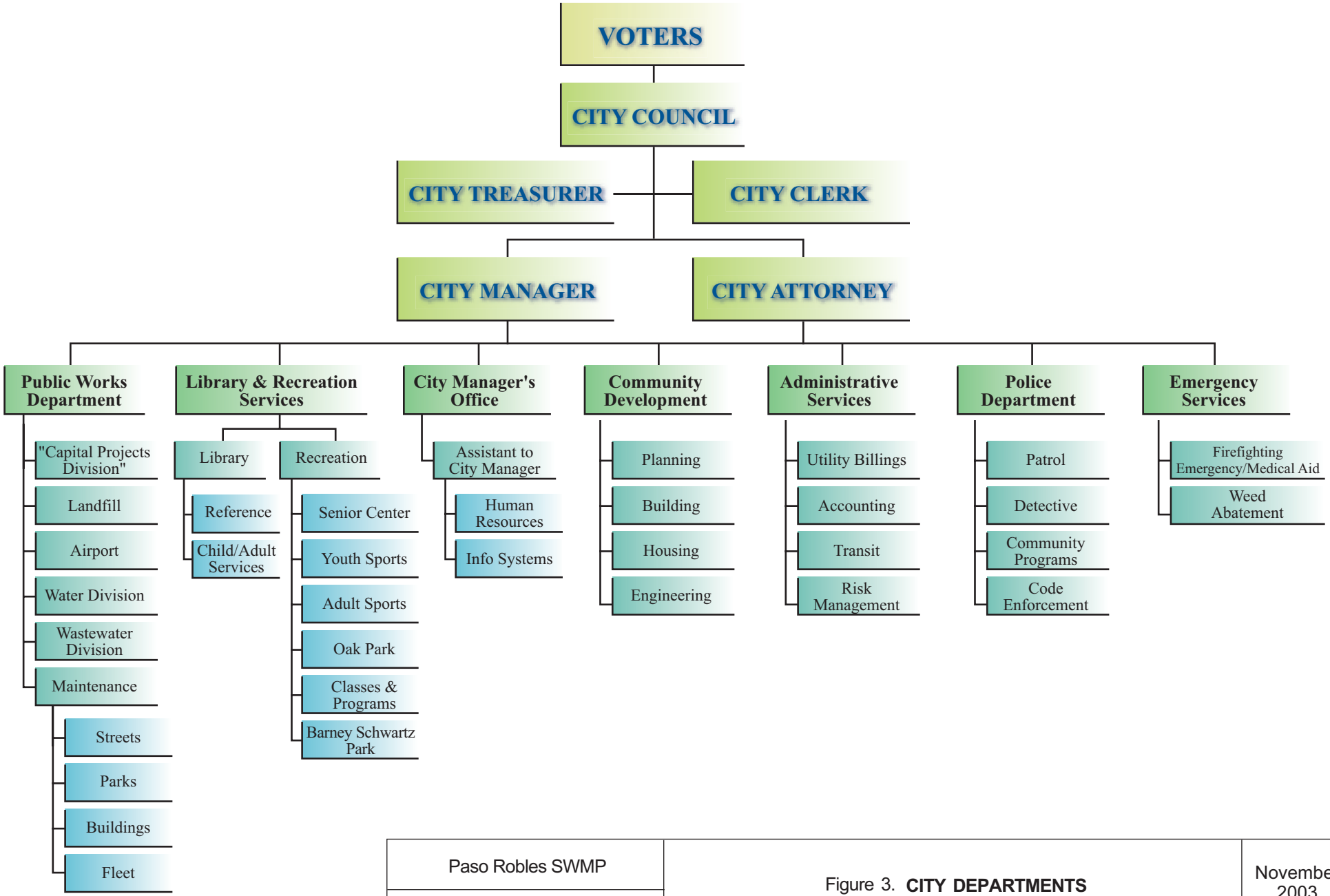
Veteran's Center & Senior Center

PASO ROBLES

SAN LUIS OBISPO COUNTY

Paso Robles SWMP **URS Corporation**	**Source:** *The Thomas Guide* Santa Barbara, San Luis Obispo and Ventura Counties, 2000	Figure 2. **CITY FACILITIES MAP**	October 2004

City of Paso Robles Organization Chart



Paso Robles SWMP **URS Corporation**	Figure 3. **CITY DEPARTMENTS**	November 2003

Nacimiento River
Nacimiento Reservoir
Lower Estrella River
Whitley Gardens
Nacimiento Lake Rd
Lower Nacimiento River
Estrella Rd
McLaghlin Canyon
San Marcos Rd
Salinas River
Estrella River
Adelaida
San Marcos Creek
Oak Knoll
101
46
Adelaida Rd
El Paso de Robles
Dry Creek
San Simeon Creek
Templeton to Paso Robles
Huerhuero Creek
Lower Huerhuero Creek
Vineyard Dr
Santa Rosa Creek Rd
Santa Rosa Creek
Creston Rd
Shandon
Paso Robles Creek
46
Cambria
Green Valley Creek
41
Green Valley Rd
Santa Rita Creek
Salinas River
1
Atascadero
Upper Huerhuero Creek
Whale Rock Reservoir
Calf Canyon Hwy
Carrisa Hwy
Atascadero Creek
41
Pacific Ocean
Morro Creek
Shell Creek
Morro
Atascadero Lake
Trout Creek
Salinas River
Parole Canyon
1
101
Morro Bay
Upper San Luis Obispo Creek
Chorro Creek
Los Osos Valley Rd

Legend

- San Luis Obispo County Boundary
- Interstate Highway
- US Highway or Primary Road Without Limited Access
- State Highway or Secondary and Connecting Road
- River, Creek or Slough
- Water Body
- Urbanized Area [1]
- Superplanning Watershed Area [2]

Note:

1 An Urbanized Area comprises a place and the adjacent densely-settled surrounding territory that together have a minimum population of 50,000 people and an overall population density of at least 1,000 people per square mile.

2 The Superplanning Watershed Area is a fifth level watershed designation within six levels of increasing specificity with the first level being a hydrologic region.

Calif.
Site Location

N
3 0 3 6 Miles
Decimal Degrees, NAD 83

Paso Robles SWMP

URS

Data Sources:
2000 Census TIGER data
California Environmental Resources Evaluation System (CERES)
California Spatial Information Library

Figure 4. **Watersheds Surrounding Paso Robles Urbanized Area**

November 2003

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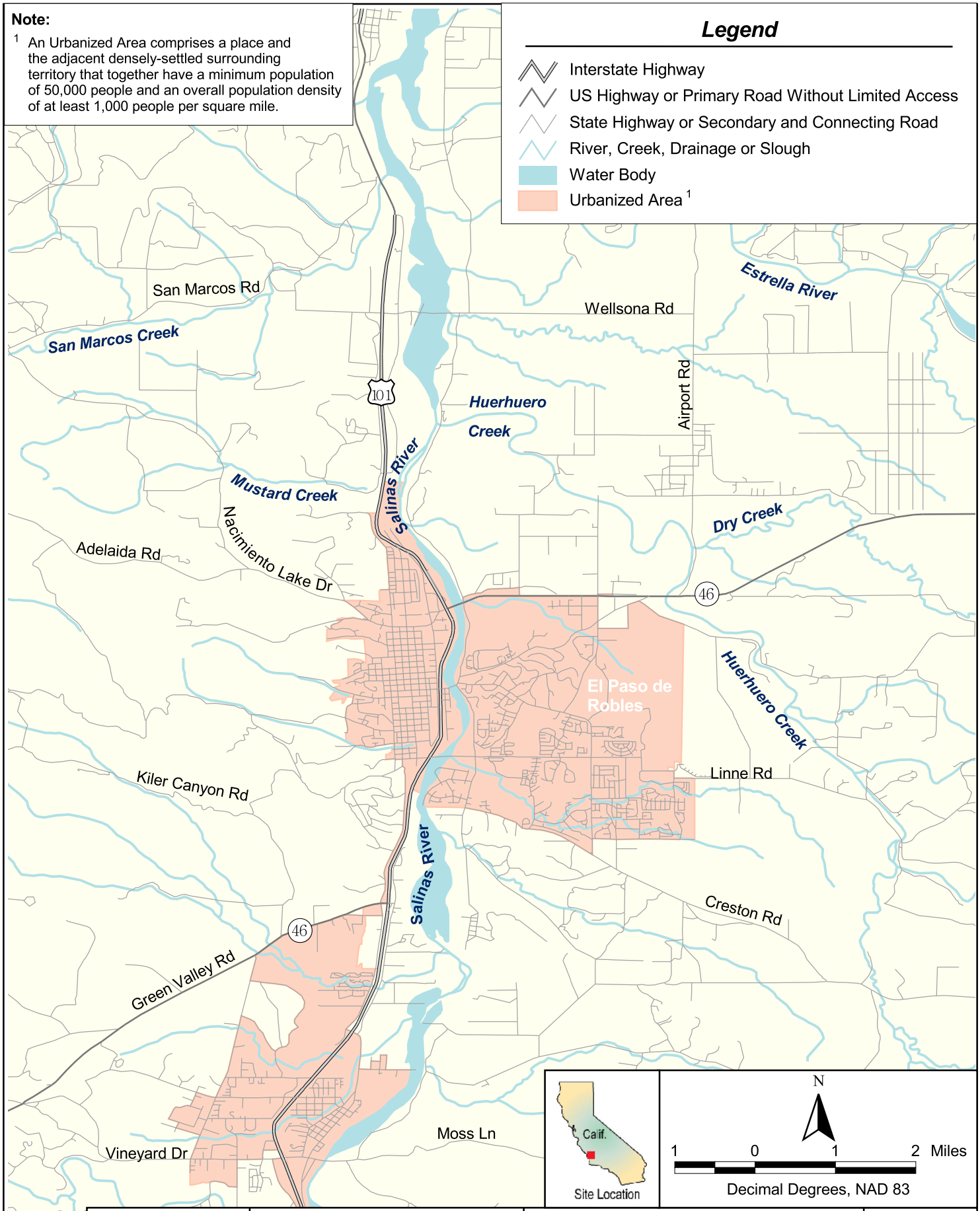

Paso Robles SWMP

URS

Data Sources:
2000 Census TIGER data
California Spatial Information Library

Figure 5. **Smaller Creeks and Drainages Near Paso Robles Urbanized Area**

November 2003